

Air Quality

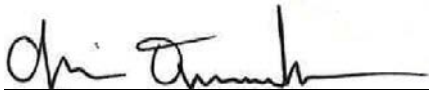
PERMIT TO CONSTRUCT

Permittee Mikey's Graphics Inc. - Jerome
Permit Number P-2015.0045
Project ID 62621
Facility ID 053-00034
Facility Location 424 East 300 South
Jerome, ID 83338

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 January 28, 2022



Chris Duerschner, Permit Writer



Mike Simon, Stationary Source Bureau Chief

Contents

1	Permit Scope.....	3
2	Facility-Wide Conditions.....	5
3	Surface Preparation (Abrasive Blasting).....	8
4	Coating Operation/Spray Paint Booth.....	11
5	General Provisions.....	19

1 Permit Scope

Purpose

1.1 This is a modified permit to construct (PTC) to allow additional flexibility for coating use.

[1/28/2022]

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.

1.3 This PTC replaces Permit to Construct No. P-2015.0045, issued on February 8, 2016.

[1/28/2022]

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, 3	Fully enclosed blasting cabinet for surface preparation of 500-gallon or smaller propane tanks, in which most of the total surface preparations occur.	Four nanofiber media cartridges with net control efficiency of 99.999% (down to one micron).
2, 3	<p><u>Blasting room for surface preparation of equipment larger than a 500-gallons propane tank</u></p> <p><u>Sand Blaster</u> Manufacturer: Pirate Brand Model: 6.5 ft³ SPR series Rated Capacity: 3,000 lb/hr</p> <p>Blasting Media: Crushed Glass or Kleen Blast</p>	Dry Abrasive Blast Room Filter System: Cartridge Style Dust Collection System Manufacturer: AM-14983 Model: #FFBW Control Efficiency: 99.8% down to 0.5 micron
2, 4	<p><u>Paint Spray Booth(s):</u> Manufacturer: Col-Met Engineered Finishing Model: EIB 12-08-26-PT</p> <p>Note: the number of booths installed at the facility is not limited by this permit</p> <p><u>Coating Spray Gun(s):</u> Manufacturer(s): Grace Model(s): Magnum ports 19/Pro LTS 19 Type: Airless Rated Capacity: 0.38 gal/min Transfer Efficiency: 65% or greater</p>	<p><u>Paint Spray Booth(s) Filter System:</u> Booth Types: special floor style, non-pressurized industrial filter cross flow</p> <p>Particulate Filtration Method: dry filter</p> <p>Paint Booth Dimensions: 26'×12'×8'</p> <p>Exhaust System: 30" tube axial in-line exhaust fan (9,600 CFM @ ½ static pressure)</p> <p>Exhaust Chamber: industrial style exhaust chamber with two 20"×20"×2" filter cells</p> <p>Filter Manufacturer(s): Exhaust filters are a fiberglass 'paint arrestor pad' made specifically for the collection of paint overspray. Filters are UL rated Class 2, with control efficiency of 98%., (overall control efficiency considering both filters in series is 99.96%).</p>
2	<p><u>Propane Flare</u> Model: NA, owner constructed Date of Construction: August 2007 Maximum Capacity: 887,716 Btu/hr Fuel: Propane</p>	None

2 Facility-Wide Conditions

2.1 Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following practices, where practical:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading or roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts; and
- Paving or roadways and their maintenance in a clean condition, where practical.

The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g. water, chemical dust suppressants) to reasonably control fugitive emissions.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

2.2 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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

2.3 Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

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

- (a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with (b).
- (b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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

2.4 Open Burning

The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600-623).

2.5 Reports and Certifications

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

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
650 Addison Avenue West, Suite 110
Twin Falls, ID 83301
Phone: (208) 736-2190
Fax: (208) 736-2194

2.6 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 for Source Categories (NESHAP), 40 CFR Part 63, Subpart HHHHHH

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

3 Surface Preparation (Abrasive Blasting)

3.1 Process Description

The facility uses abrasive blasting to prepare the surface of propane tanks or truck trailers prior to painting. For propane tanks smaller than 500 gallons, blasting occurs in an enclosed blasting cabinet. For truck trailers and propane tanks larger than 500 gallons, blasting occurs in a blasting room.

3.2 Control Device Descriptions

Table 3.1 Surface Preparation Description

Emissions Units / Processes	Control Devices	Emission Points
Fully enclosed blasting cabinet	Fully enclosed, air filtration equipment with overall capture and control efficiency of 99.999%, down to one micron	None
Blasting room	Air filtration equipment with overall capture and control efficiency of 99.8%.	EP2

Emission Limits

3.3 Emission Limits

The emissions from the blasting room stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Surface Preparation Emission Limits^(a)

Source Description	PM ₁₀ ^(b)		PM _{2.5}	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Blasting Room	0.0014	0.0043	0.00014	0.00043

- 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 two point five (2.5) and 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.

[1/28/2022]

Operating Requirements

3.4 Throughput Limits

Use of blasting media in the blasting room shall not exceed:

- 1,272 pounds per day
- 330,720 pounds per consecutive 12-month period.

3.5 Blasting Media Requirement

The permittee shall not use blasting media containing HAP.

3.6 Operating Requirements for Surface Preparation of Propane Tanks up to 500 Gallons in Size

All surface preparation of propane tanks smaller than or of equal size to 500 gallons shall occur within an enclosed blasting cabinet. The cabinet shall be equipped with an air filtration system that achieves a net capture and control efficiency of 99.999% for particles down to one micron. Abrasive blasting shall occur with the cabinet door closed and the filter panels secured in place.

[1/28/2022]

3.7 Operating Requirements for Blasting Equipment Larger than a 500-gallon Propane Tank

All surface preparation of propane tanks larger than 500 gallons, and all other equipment too large to fit in the blasting cabinet, shall occur in a blasting room equipped with an air filtration system that achieves a net capture and control efficiency of 99.8% or greater to control PM/PM₁₀/PM_{2.5} emissions.

[1/28/2022]

Monitoring and Recordkeeping Requirements

3.8 Throughput Monitoring

The permittee shall monitor and record daily blasting media usage in pounds per day to demonstrate compliance with the daily throughput limit under the Throughput Limits permit condition.

Each calendar month, the permittee shall monitor and record total the blasting media usage for the previous month in pounds per month. Annual throughput shall be determined by summing the monthly throughput over the previous consecutive 12-month period to demonstrate compliance with the Throughput Limits permit condition. Records shall be kept in accordance with the General Provisions.

3.9 Blast Media Monitoring

The permittee shall keep the Safety Data Sheets (SDS) of the blasting media to demonstrate compliance with the Blasting Media Requirement permit condition.

3.10 Filter Media Monitoring

- For the fully enclosed blasting cabinet, the permittee shall keep records showing that the air filtration equipment has overall capture and control efficiency of 99.999%, down to one micron.
- For the blasting room, the permittee shall keep records showing that the air filtration equipment has overall capture and control efficiency of 99.8% or greater for PM/PM₁₀/PM_{2.5} emissions.

3.11 Baghouse/Filter System Procedures

The permittee shall maintain a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the fully enclosed blasting cabinet or from the existing blasting room. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in them manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance Permit Condition in General Provision 5.2 and

shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse/filter system at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse/filter system inspection in accordance with the Monitoring and Recordkeeping Permit Condition in General Provision 5.10. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g., exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present, a description of the corrective action that was taken;
- Date corrective action was taken.

Any changes to the Baghouse/Filter System Procedures document shall be submitted to DEQ within 15 days of the change.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring, and recordkeeping requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[1/28/2022]

4 Coating Operation/Spray Paint Booth

4.1 Process Description

The facility spray applies coatings to propane tanks and truck trailers in a spray paint booth.

4.2 Control Device Descriptions

Table 4.1 Control Device Description

Emissions Units / Processes	Control Devices	Emission Points
Paint Spray Booth	Airless, HVLP, or equivalent spray guns with transfer efficiency 65% or greater. Filter system with overall PM/PM ₁₀ /PM _{2.5} control efficiency of 99.96% or better (99.8% contributed by each of the two filters in series).	EP1

Emission Limits

4.3 Coating Emission Limits

The emissions from the Spray Paint Booth stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Coating Emission Limits^(a)

Source Description	PM ₁₀ ^(b)		PM _{2.5} ^(b)		VOC ^(e)		Individual HAP ^(f)	Total HAP ^(g)
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	T/yr ^(d)	T/yr ^(d)
Spray Paint Booth	0.0045	0.0047	0.0045	0.0047	3.3	10.3	6.55	8.77

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) and two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- 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.
- Tons per any consecutive 12-calendar month period.
- Volatile organic compounds (VOC).
- Emission limit for each single hazardous air pollutant (HAP).
- Emission limit for total of all HAP (combined).

[1/28/2022]

Operating Requirements

4.4 Approved Daily Coating Usage Limits

Unless the permittee is complying with an Alternate Daily Coating Usage Scenario which demonstrates compliance with the Coating Emission Limits permit condition and Screening Emission Rates, the permittee shall use only those coating materials listed below. The combined usage of these materials shall not exceed 11.6 gallons per day, except that the individual usage of Carboquick 200 shall not exceed 10 gallons per day.

- Lacquer Thinner SW R7K115
- 2025 Acrylic Mod Clear Base EN
- V 2131 Shop Coat Primer
- Carbothane 134 HG
- Carbozinc 859

- Carboquick 200
- Imron 3.5+ Poly RF

[1/28/2022]

4.5 Days of Operation Limit

The permittee shall not perform spray coating on more than 260 days per consecutive 12-month period.

[1/28/2022]

4.6 Operating Requirements

- All spray-painting activities shall occur within a paint booth with an air filtration system to remove particulate matter in the overspray.
- The air filtration system shall achieve a net capture and control efficiency of 99.96% or greater control efficiency (such as through two 98% efficient filters in series) for PM/PM₁₀/PM_{2.5}.
- All spray painting shall be performed using airless, HVLP, or equivalent spray guns with 65% or higher material transfer efficiency.

[1/28/2022]

Alternate Daily Coating Usage Scenarios (If Applicable)

Unless using an Approved Daily Coating Usage Scenario for which compliance has previously been determined in Table 4.2, 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 following permit conditions.

4.7 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 PM₁₀/PM_{2.5}, VOC, individual HAP, total HAP, and all TAP listed in Table 4.3 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).

[1/28/2022]

4.8 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 4.3:

- 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 Table 4.3 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. Alternatively, for isocyanate-based “iso” materials such as those used in 2-part urethane systems, isocyanate-based TAP emissions may instead be multiplied by one minus the documented spray gun transfer efficiency and by 15% to account for the isocyanate reaction.
- 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.

[1/28/2022]

4.9 Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions from all coating operations and compare against the TAP Screening Emission Rates in Table 4.3:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 4.3.

Table 4.3 TAP Screening Emission Rates^(a)

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(b)
Acetone	67-64-1	No	2856
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008
Aluminum - Soluble Salts	7429-90-5	Yes	3.192
n-Amyl Acetate	628-63-7	No	847.2
Barium	7440-39-3	Yes	0.792
Benzoyl Peroxide	94-36-0	No	7.992
2-Butoxyethanol (EGBE; Ethylene Glycol Monobutyl Ether)	111-76-2	No	192
n-Butyl Acetate	123-86-4	No	1135.2
tert-Butyl Acetate	540-88-5	No	1519.2
n-Butyl Alcohol	71-36-3	No	240

Table 4.3 TAP Screening Emission Rates^(a) (continued)

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(b)
Sec-Butyl Alcohol (2-Butanol)	78-92-2	No	487.2
Butyl Hydroxytoluene (2,6-Di-tert-butyl-p-cresol)	128-37-0	No	16.008
Calcium Carbonate (Limestone)	1317-65-3	Yes	16.008
Calcium Sulfate (Gypsum)	13397-24-5	Yes	16.008
Carbon Black	1333-86-4	Yes	5.52
Copper	7440-50-8	Yes	1.608
Cyclohexane	110-82-7	No	1680
Cyclohexanone	108-94-1	No	160.08
Diacetone Alcohol	123-42-2	No	384
o-Dichlorobenzene	95-50-1	No	480
Diethyl Phthalate	84-66-2	No	7.992
Diisobutyl Ketone	108-83-8	No	232.08
Dipropylene Glycol Methyl Ether	34590-94-8	No	960
2,6-Di-tert-butyl-p-cresol (Butylated Hydroxytoluene)	128-37-0	No	16.008
Ethanolamine (2-Aminoethanol; Monoethanolamine)	141-43-5	No	12.792
Ethyl Acetate	141-78-6	No	2239.2
Ethyl Alcohol	64-17-5	No	3000
Ethylenediamine (1,2-Diaminoethane)	107-15-3	No	40.08
Furfuryl Alcohol	98-00-0	No	64.08
Heptane (n-Heptane)	142-82-5	No	2616
Iron Oxide (Fe ₂ O ₃)	1309-37-1	Yes	7.992
Isobutyl Acetate	110-19-0	No	1120.8
Isobutyl Alcohol	78-83-1	No	240
Isophorone Diisocyanate	4098-71-9	No	0.144
Isopropyl Alcohol (Isopropanol)	67-63-0	No	1567.2
Isopropyl Acetate	108-21-4	No	1663.2
Kaolin	1332-58-7	Yes	3.192
Magnesite (Magnesium Carbonate)	546-93-0	Yes	16.008
Methacrylic Acid	79-41-4	No	112.08
1-Methoxy-2-Propanol Acetate (PGMEA)	108-65-6	No	576
Methyl Acetate	79-20-9	No	976.8
Methyl n-Amyl Ketone (Heptan-2-one)	110-43-0	No	376.8
Methyl Ethyl Ketone (MEK)	78-93-3	No	943.2
Methyl Isoamyl Ketone	110-12-3	No	384
Methyl Isobutyl Carbinol	108-11-2	No	166.32
o-Methylcyclohexanone	583-60-8	No	367.2
Methylene Bis (4-Cyclohexyl Isocyanate) (H12MDI; Dicyclohexylmethane 4,4'-Diisocyanate) ^(d)	5124-30-1	No	0.168
Methyl Propyl Ketone (2-Pentanone)	107-87-9	No	1120.8
Mica	12001-26-2	Yes	4.8
Molybdenum	7439-98-7	Yes	7.992
Nonane	111-84-2	No	1680
Pentane	109-66-0	No	2832
Phosphoric Acid	7664-38-2	No	1.608
Portland Cement	65997-15-1	Yes	16.008
Propionic Acid	79-09-4	No	48
n-Propyl Acetate	109-60-4	No	1344
Propyl Alcohol	71-23-8	No	799.2
Silica – Amorphous, including: <ul style="list-style-type: none"> • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel 	61790-53-2 112926-00-8	Yes	16.008
Silica - Crystalline - Cristobalite	14464-46-1	Yes	0.0792
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	0.1608
Silicon Tetrahydride (Silane)	7803-62-5	No	11.208

Table 4.3 TAP Screening Emission Rates^(a) (continued)

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(b)
Sodium Hydroxide (Caustic Soda)	1310-73-2	No	3.192
Stoddard Solvent	8052-41-3	No	840
Tert-Butyl Acetate	540-88-5	No	1519.2
Tetrahydrofuran	109-99-9	No	943.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8
Vinyl Toluene (Methylstyrene)	25013-15-4	No	384
VM&P Naphtha (Petroleum Ether; Ligroin)	8032-32-4	No	2191.2
Zinc	7440-66-6	Yes	16.008
Zinc Oxide	1314-13-2	Yes	16.008
Zirconium	7440-67-7	Yes	7.992

- a) If an alternate coating is introduced and contains a non-HAP IDAPA 58.01.01.585-586 substance that is not listed in this table, compliance with each screening emission rate and modeled concentration limit in IDAPA 58.01.01.585-586 shall be demonstrated.
- b) 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.
- c) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.
- d) Isocyanate-based TAP for the purposes of estimating coating TAP emissions (Permit Condition 4.7).

[1/28/2022]

4.10 Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate emissions from all coating operations and compare against the Coating Emission Limits in Table 4.2:

- Daily PM₁₀/PM_{2.5} 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. Emissions from isocyanate-based “iso” coating materials (Table 1.4) used in 2-part urethane systems may be multiplied by 15% to account for material applied, consumed in the reaction, and captured by filtration.
- Daily 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).
- Daily 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).
- Annual PM₁₀/PM_{2.5}, VOC, and HAP emissions shall be determined by summing daily emissions (lb/day) over the previous consecutive 365-day period and dividing by 2000 pounds per ton (lb/T).
- 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 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 Emission Limits in Table 4.2. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

[1/28/2022]

Monitoring, Recordkeeping, and Reporting Requirements

4.11 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 material used, including but not limited to primers, stains, basecoats, glazes, sealers, lacquers, thinners, solvents, reducers, caulking, and adhesives to demonstrate compliance with Approved Alternate Daily Coating Usage Limits and Alternative Coating Usage Scenario requirements.

- If no Alternate Daily Coating Usage Scenarios were used in the calendar day, the daily usage rates shall be compared against the Approved Daily Coating Usage Limits.
- If Alternate Daily Coating Usage Scenarios were used in the calendar day, emissions from all coatings shall be summed and compared against TAP screening emission rates using the estimation procedures provided in the Estimate Coating TAP Emissions permit condition, and compared against Coating Emission Limits using the estimation procedures provided in the Demonstrate Coating Emission Limit Compliance permit condition.
- Exceedances of Approved Daily Coating Usage Limits Coating Usage Limits shall be treated as excess emission event(s), and the permittee shall report these in accordance with the excess emission procedures and requirements provided in the General Provisions of this permit.

[1/28/2022]

4.12 Coating Usage Scenario Monitoring

Each calendar day on which an Alternate Coating Usage Scenario will be 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.

[1/28/2022]

4.13 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)

[1/28/2022]

4.14 Coating Usage Scenario Reporting

Each year, for Coating Usage Scenarios that have not already been submitted, the permittee shall submit a report by May 1st on all unapproved 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. Documentation should be in sufficient detail, including documentation of all calculations, 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

[1/28/2022]

4.15 Days of Operation Recordkeeping

Each calendar month, the permittee shall monitor and record the number of days that the facility operated in that month. Annual operation shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Days of Operation Limit permit condition.

[1/28/2022]

4.16 Filter Media Monitoring

The permittee shall keep records showing that the air filtration equipment has overall capture and control efficiency to control PM/PM₁₀/PM_{2.5} emissions of 99.96% or better.

4.17 Baghouse/Filter System Procedures

The permittee shall maintain a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the spray paint booth. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in them manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance Permit Condition in General Provision 5.2 and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse/filter system at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse/filter system inspection in accordance with the Monitoring and Recordkeeping Permit Condition in General Provision 5.10. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g., exterior housing of baghouse, fan motor, auger, inlet air ducting);

- Description of whether visible emissions were present, and if visible emissions were present, a description of the corrective action that was taken;
- Date corrective action was taken.

Any changes to the Baghouse/Filter System Procedures document shall be submitted to DEQ within 15 days of the change.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring, and recordkeeping requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[1/28/2022]

40 CFR 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

- 4.18** The permittee is subject to 40 CFR 63 Subpart HHHHHH because it is an area source for HAP and performs spray application of coatings to mobile equipment as defined in 40 CFR 63.11180, such as truck trailers. These provisions do not apply to coating of propane tanks, only to coating of truck trailers and other mobile equipment.

However, in accordance with 40 CFR 63.11170, the permittee may petition the Administrator for an exemption from this subpart if the permittee can demonstrate, to the satisfaction of the Administrator, that the permittee spray applies no coatings that contain the target HAP, as defined in 40 CFR 63.11180. Petitions must include a description of the coatings that the permittee spray applies and the permittee's certification that the permittee does not spray apply any coatings containing the target HAP. If circumstances change such that the permittee intends to spray apply coatings containing the target HAP, the permittee must submit the initial notification required by 40 CFR 63.11175 and comply with the requirements of 40 CFR 63 Subpart HHHHHH.

As of this permit issuance, the permittee has submitted a petition for exemption from 40 CFR 63 Subpart HHHHHH. Therefore, the permittee is exempt from the requirements of this subpart. To maintain exempt status, the permittee shall not spray apply any coating that contains more than one percent by mass of Chromium, Lead, Manganese, Nickel, or Cadmium (collectively the target HAP). If any Alternate Daily Coating Usage scenario involves the spray application of a target HAP to mobile equipment, the permittee shall submit the initial notification required by 40 CFR 63.11175 and shall comply with the requirements of 40 CFR 63 Subpart HHHHHH.

5 General Provisions

General Compliance

5.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

5.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/1994]

5.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/1994]

Inspection and Entry

5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/1994]

5.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; 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, 5/1/1994]

- 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, 5/1/1994]

Performance Testing

5.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

5.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

5.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The 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, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

5.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/1994]

Excess Emissions

- 5.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/2000]

Certification

- 5.12** All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/1994]

False Statements

- 5.13** No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/1998]

Tampering

- 5.14** No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/1998]

Transferability

- 5.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 5.16** The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/1994]