



State of Utah

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*Governor*

GARY R. HERBERT  
*Lieutenant Governor*

Department of  
Environmental Quality

Amanda Smith  
*Acting Executive Director*

DIVISION OF AIR QUALITY  
Cheryl Heying  
*Director*

10874

## Title V Operating Permit

**PERMIT NUMBER:** 4900194003

**DATE OF PERMIT:** July 9, 2009

Date of Last Revision: July 9, 2009

This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Powder River Incorporated  
485 East 1130 South  
Provo, UT 84606

**Permitted Location:**

Powder River Livestock Handling Equipment  
388 East 900 South  
Provo, UT 84606

UTM coordinates: 444,646 m Easting, 4,452,230 m Northing  
SIC code: 3523 (Farm Machinery & Equipment)

### UTAH AIR QUALITY BOARD

By:

\_\_\_\_\_  
M. Cheryl Heying, Executive Secretary

Prepared By:

\_\_\_\_\_  
Brandy Cannon

## **ENFORCEABLE DATES AND TIMELINES**

The following dates or timeframes are referenced in  
Section I: General Provisions of this permit.

Annual Certification Due: April 3 of every calendar year that this permit is in force.

Renewal application due: January 9, 2014

Permit expiration date: July 9, 2014

Definition of “prompt”: written notification within 14 days.

### **ABSTRACT**

Powder River Livestock Handling Equipment, Inc. is located in Provo, Utah. The source fabricates and paints livestock handling equipment, such as squeeze chutes, gates, feeders, water troughs, and rodeo equipment. The source is major for volatile organic compounds (VOCs). The source is subject to 40 CFR 63 Subpart A and MMMM.

## OPERATING PERMIT HISTORY

<b>Permit/Activity</b>	<b>Date Issued</b>	<b>Recorded Changes</b>
Title V renewal application (Project #OPP0108740006)	7/9/2009	Changes: The renewal permit removes three units (paint spray booth, parts cleaner, and soaker tanks) that have been dismantled and/or removed from the permitted location and removes their associated conditions and reviewer comments, incorporates applicable requirements from 40 CFR 63 Subpart Mmmm, clarifies applicability of the source-wide operation and maintenance condition, removes installation notification conditions that have been fulfilled, updates rule references.
Title V administrative amendment by DAQ (Project #OPP0108740004)	3/28/2005	Changes: to incorporate changes approved in DAQE-AN0874004-05, dated January 18, 2005, including the following: addition of a primer powder coating booth to the existing powder coating system, addition of a hook burn off oven controlled by an afterburner, and an increase in the natural gas consumption limit.
Title V renewal application (Project #OPP0108740003)	5/24/2004	
Title V administrative amendment by source (Project #OPP0108740002)	10/20/1999	Changes: to include conditions from a new Approval Order issued by the Utah Division of Air Quality to Powder River Inc.
Title V initial application (Project #OPP0108740001)	7/23/1998	

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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

## **SECTION I: GENERAL PROVISIONS**

### **I.A Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

### **I.B Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

### **I.C Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

### **I.D Permit Expiration and Renewal.**

I.D.1 This permit is issued for a fixed term of five years and expires on the date shown under "Enforceable Dates and Timelines" at the front of this permit. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due on or before the date shown under "Enforceable Dates and Timelines" at the front of this permit. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E **Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F **Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G **Permit Fee.**

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H **No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I **Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J **Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

- I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))
- I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))
- I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))
- I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than the date shown under "Enforceable Dates and Timelines" at the front of this permit, and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
1595 Wynkoop Street  
Denver, CO 80202-1129

**I.M Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

**I.N Emergency Provision.**

- I.N.1 An "emergency" is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency.

(R307-415-6g(3)(a))

- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))
- I.O **Operational Flexibility.**  
Operational flexibility is governed by R307-415-7d(1).
- I.P **Off-permit Changes.**  
Off-permit changes are governed by R307-415-7d(2).
- I.Q **Administrative Permit Amendments.**  
Administrative permit amendments are governed by R307-415-7e.
- I.R **Permit Modifications.**  
Permit modifications are governed by R307-415-7f.
- I.S **Records and Reporting.**
- I.S.1 Records.
- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.

- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.
- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt, as used in this condition, shall be defined as written notification within the number of days shown under "Enforceable Dates and Timelines" at the front of this permit. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:
- Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000
- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:
- For annual compliance certifications:
- Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
1595 Wynkoop Street  
Denver, CO 80202-1129

For reports, notifications, or other correspondence related to permit modifications, applications, etc.:

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance Air & Radiation Program  
(mail code 8P-AR)  
1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone: 303-312-6440

**I.T Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the Acid Rain Program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit. (R307-415-7g(1)(b))

I.T.3 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

**I.U Inventory Requirements.**

An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

**I.V Title IV and Other, More Stringent Requirements**

Where an applicable requirement is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, Acid Deposition Control, both provisions shall be incorporated into this permit. (R307-415-6a(1)(b))

## **SECTION II: SPECIAL PROVISIONS**

- II.A           **Emission Unit(s) Permitted to Discharge Air Contaminants.**  
(R307-415-4(3)(a) and R307-415-4(4))
- II.A.1       **Permitted Source**  
                Source-wide
- II.A.2       **2: Paint Dipping Operation**  
                7,000-gallon dipping tank, natural gas fired forced air dry system, airless spray guns for touch-up painting, exhaust fans to outside of building. (pre-1969)
- II.A.3       **3: Powder Coating Line**  
                Powder coating booths, 3 natural gas boilers rated between 0.8 and 1.5 MMbtu/hr, 3 natural gas ovens rated at 0.8, 1.6 and 2.4 MMbtu/hr, and 4 inside vented dust collectors.
- II.A.4       **4: Welding Area**  
                Welding equipment, vented to outside with fans and roof vents. (pre-1969)
- II.A.5       **5: Hook Burn-Off Oven**  
                Natural gas oven rated at 0.4 MMbtu/hr and controlled by an afterburner. The hook burn-off oven is used exclusively for processing metal racks and metal parts.
- II.A.6       **8: Misc. Tanks**  
                Two 500-gallon fuel tanks. No unit-specific applicable requirements.
- II.B           **Requirements and Limitations**
- The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated:
- II.B.1       **Conditions on permitted source (Source-wide)**
- II.B.1.a      **Condition:**
- Natural gas consumption shall be no greater than 84,700,000 cubic feet per rolling 12-month period. [Origin: DAQE-AN0874004-05] [R307-401-8(1)(a)(BACT)]
- II.B.1.a.1    **Monitoring:**
- Compliance with the limitation shall be demonstrated through a rolling 12-month total. The permittee shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records shall be kept for all periods when the source is in operation.
- II.B.1.a.2    **Recordkeeping:**
- Records such as gas bills, gas meter readings and calculations, used to determine compliance with the natural gas consumption limit shall be maintained as described in Provision I.S of this permit.
- II.B.1.a.3    **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.

**II.B.1.b Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Origin: DAQE-AN0874004-05] [R307-401-8(1)(a)(BACT)]

**II.B.1.b.1 Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than steam are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for point sources, and in accordance with 58 FR 61640 Method 203C for fugitive emission sources.

**II.B.1.b.2 Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 or 58 FR 61640, Method 203C shall also be maintained in accordance with Provision I.S.1 of this permit.

**II.B.1.b.3 Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

**II.B.1.c Condition:**

Unless otherwise specified in this permit, at all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (This condition does not apply to 2: Paint Dipping Operation or 4: Welding Area.) [Origin: DAQE-AN0874004-05] [R307-401-8(2), R307-401-8(1)(a)(BACT)]

**II.B.1.c.1 Monitoring:**

Records required for this permit condition will serve as monitoring.

**II.B.1.c.2 Recordkeeping:**

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

**II.B.1.c.3 Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2 **Conditions on 2: Paint Dipping Operation**

II.B.2.a **Condition:**

For all affected emission units subject to 40 CFR 63 Subpart Mmmm:

At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected emission unit, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. This general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [Origin: 40 CFR 63 Subpart A, Mmmm] [40 CFR 63.6(e)(1)(i), 40 CFR 63.3900(b)]

II.B.2.a.1 **Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.2.a.2 **Recordkeeping:**

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.b **Condition:**

For all affected emission units subject to 40 CFR 63 Subpart Mmmm:

At all times, and for any coating operation(s), the permittee shall limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gallon) coating solids used during each 12-month compliance period. [Origin: 40 CFR 63 Subpart Mmmm] [40 CFR 63.3890(b)(1), 40 CFR 63.3900(a)(1)]

II.B.2.b.1 **Monitoring:**

The permittee shall perform all applicable monitoring required in 40 CFR 63.3891-63.3891(b), 63.3942(a)-(b), 63.3952(a)-(b).

II.B.2.b.2 **Recordkeeping:**

The permittee shall maintain all records required in 40 CFR 63.3930-63.3930(c)(3), (d)-(j), 63.3931, 63.3942(d), 63.3952(d). There are no additional recordkeeping requirements except as outlined in Provision I.S.1 of this permit.

II.B.2.b.3

**Reporting:**

The permittee shall submit all reports required in 40 CFR 63.3920(a)-(a)(3)(v), (a)(4)-(a)(6), 63.3942(c), 63.3952(c). There are no additional reporting requirements except as outlined in Section I of this permit.

II.C

**Emissions Trading**

(R307-415-6a(10))

Not applicable to this source.

II.D

**Alternative Operating Scenarios.**

(R307-415-6a(9))

Not applicable to this source.

### **SECTION III: PERMIT SHIELD**

A permit shield was not granted for any specific requirements.

### **SECTION IV: ACID RAIN PROVISIONS**

**This source is not subject to Title IV. This section is not applicable.**

## REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

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Incorporates	DAQE-AN0874004-05 dated January 18, 2005
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1. Comment on an item originating in 40 CFR 64 regarding Permitted Source Compliance Assurance Monitoring (CAM): CAM applicability has been evaluated and there are no CAM requirements in this permit. [Last updated March 9, 2009]
  
2. Comment on an item originating in DAQE-AN0874004-05 regarding Permitted Source Unit Removal: The paint spray booth (unit #1) was dismantled and removed from the permitted location July 10, 1998. The corresponding conditions, II.B.2.a, b, and c in the 3/28/2005 operating permit, have been removed. The soaker tanks (unit #7) were also removed from the site July 10, 1998. There were no permit conditions associated with the soaker tanks. The parts cleaner (unit #6) has been removed from the site but the date of removal is unknown. There were no unit-specific permit conditions associated with the parts cleaner. The permittee has confirmed removal of the above equipment in an email received by DAQ on 3/11/2009. [Last updated March 12, 2009]
  
3. Comment on an item originating in 40 CFR 63 Subpart Mmmm regarding 2: Paint Dipping Operation  
Comments clarifying current permittee operations to determine applicable requirements from Subpart Mmmm: 40 CFR 63.3881(b) lists the applicability criteria for the permittee as a source that uses 250 gallons per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products and that has the potential to emit (PTE) any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. Since the affected emission unit was installed prior to 1969 and has not been modified, there are no permit requirements limiting PTE HAPs below the major source threshold. Therefore Subpart Mmmm applies to the items specified in 63.3882(b) below that are part of the affected emission unit.

The affected equipment belongs to the general use coating subcategory as defined in Subpart Mmmm and is subject to the general use coating limit. Per 63.3881(a)(2), 'The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.'

40 CFR 63.3882(b)(1)-(4) further defines the affected equipment within that subcategory as the collection of all items listed below that are used for surface coating of miscellaneous metal parts and products.

- (1) All coating operations as defined in 63.3981;
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

The term 'coating operation' used in the HAP emission limit is defined in 40 CFR 63.3981.

Since the affected emission unit was installed prior to 1969 and has not been reconstructed,

it is existing according to 40 CFR 63.3882(e).

The permittee has completed the initial compliance demonstration and notifications required by 63.3883, so those requirements have not been carried forward in the permit.

Since there are no add-on controls on any of the Subpart MMMM affected equipment, the permittee has two options for demonstrating compliance with the emission limit, the compliant material option or the emission rate without add-on controls option. [40 CFR 63.3891] Operating limits and work practice standards are not required for either of those options. [40 CFR 63.3892, 63.3893] Because the permittee has no add-on controls on the affected emission unit, a startup, shutdown, and malfunction plan is not required. [Table 2 of 40 CFR 63 Subpart MMMM] [Last updated June 29, 2009]

4. Comment on an item originating in DAQE-AN0874004-05 regarding 3: Powder Coating Line Removal of installation notice requirement: The permittee has confirmed that installation was completed on the primer powder coating booth controlled by two exhaust systems with filters (vented inside) on August 1, 2006. The installation notice requirement, condition II.B.3.a in the 3/28/2005 operating permit, has been removed from the permit. [Last updated March 30, 2009]
5. Comment on an item originating in DAQE-AN0874004-05, Condition #14 regarding 5: Hook Burn-Off Oven  
Clarification of use: As stated in Section II.A, the hook burn-off oven is to be used exclusively for processing metal racks and metal parts. No other material or rubbish is allowed. [1/19/2005] [Last updated March 9, 2009]
6. Comment on an item originating in DAQE-AN0874004-05 regarding 5: Hook Burn-Off Oven Removal of installation notice requirement: The permittee has confirmed that installation was completed on the hook burn-off oven and afterburner on August 1, 2006. The installation notice requirement, condition II.B.4.a in the 3/28/2005 operating permit, has been removed from the permit. [Last updated March 30, 2009]