

LANE REGIONAL AIR PROTECTION AGENCY

1010 Main Street, Springfield, Oregon 97477

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SIMPLE

AIR CONTAMINANT DISCHARGE PERMIT

Issued in accordance with provisions of Title 34, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

Peterson Pacific Corp.
29408 Airport Road
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene
Dated: November 27, 2000

Mailing Address:

P.O. Box 40490
Eugene, OR 97402

Fee Basis:

Title 37, Table 1:
Part B: 74
All Other Sources not listed herein that LRAPA determines an air quality concern exists including minor sources of HAPs not elsewhere classified or one which would emit significant malodorous emissions

Permit Number: 206442

Permit Type: Simple "Low"

SIC: 3531 Construction Machinery and Equipment

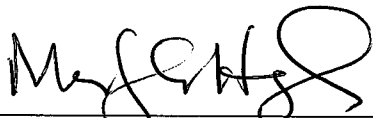
Date Renewed: June 29, 2010

Expiration Date: June 29, 2015

Permitted Sources:

3 Paint Booths
2 Burn Tables
1 Plasma Punch
1 CNC Router

Issued By:



Merlyn L. Hough, Director

Effective Date:

OCT 27 2011

ADDENDUM NO. 1

Non NSR/PSD Basic Technical Permit Modification

In accordance with Section 37-0064-5.B.1, Air Contaminant Discharge Permit No. 206442 is hereby amended to add a table of permitted sources to the cover page of this permit and an Emission Unit Description to Section 1.0 of this permit. Additionally a CNC Router with attached baghouse was added under permitted sources on the cover page and to the Emission Unit Description Table in accordance with Title 37 of LRAPA's Rules and Regulations.

1.0 PERMITTED ACTIVITIES

Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

1.1. Emission Unit Description

Device/Process:

EU ID	Description	Control	Date Installed
SB-A	Spray Booth (East)	Spray booth filter system	1995
SB-B	Spray Booth (Open)	Spray booth filter system	1999
SB-C	Spray Booth (West)	Spray booth filter system	1999
BT-A	Burn Table (Messer)	Baghouse	June 2008
BT-B	Burn Table (Kinetic)	Water Table	July 2007
BT-C	Plasma Punch (Whitney)	Baghouse	March 2007
CNC-A	CNC Machine (C.R. Onsrud)	Baghouse	October 2011

MTL/cmw
10/26/11

SIMPLE
AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

This permit is being issued in accordance with the provisions of LRAPA's Rules & Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Peterson Pacific Corp.
29408 Airport Road
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application No.: 51509 and 53023
Date Received: November 13, 2006
June 10, 2008

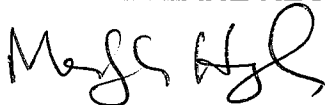
PLANT SITE LOCATION:

29408 Airport Road
Eugene, Oregon 97402

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Eugene
Approval Date: November 27, 2000

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



JUN 29 2010

Merlyn L. Hough, Director

Dated

Source(s) Permitted to Discharge Air Contaminants (37-0020):

Table 1 Code	Source Description	SIC
Part B, 74	All Other Sources not listed herein that LRAPA determines an air quality concern exists including minor sources of HAPs not elsewhere classified or one which would emit significant malodorous emissions	3531

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1.0 PERMITTED ACTIVITIES

Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

2.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

Metal Fabrication NESHAP Standards Beginning July 25, 2011 the permittee must comply with the Nine Metal Fabrication and Finishing Source Categories Area Source NESHAP (40 CFR 63 subpart XXXXXX) management, notification, reporting, and recordkeeping practices outlined in Attachment B to this permit.

3.0 PLANT SITE EMISSION LIMITS

3.1. **Plant Site Emission Limits (PSEL)** Plant site emissions must not exceed the following:

Pollutant	Limit	Units
VOC	39	tons per year
Single HAP	9	tons per year
Combined HAPs	24	tons per year

3.2. **Annual Period** The annual plant site emissions limits apply to any 12-consecutive calendar month period.

3.3. **Mass Balance without controls** Annual VOC/HAP emissions for each 12 consecutive calendar month period are calculated by the following formula:

$$E_{\text{VOC/HAP}} = [\sum(C_x * D_x * K_x) - W] \times 1\text{ton}/2000\text{pounds}$$

Where,

$$E_{\text{VOC/HAP}} = \text{Annual VOC/HAP emissions in tons}$$

$$C = \text{Material usage for the period in gallons per calendar month}$$

- D = Material density in pounds per gallon
- K = Percent VOC/HAP by weight concentration expressed as a decimal.
- X = Subscript X represents a specific material.

4.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 4.1. Monitoring and Work Practices Requirements** The permittee must monitor the operation and maintenance of the plant and associated air contaminant control devices. The permittee must operate and maintain pressure gauges for measuring the pressure drop across the baghouses and paint booths in accordance with the manufacturer's written instructions.
- 4.2. O&M plan** The permittee must prepare and implement an operation and maintenance (O&M) plan in accordance with LRAPA Title 32.

5.0 GENERAL EMISSION STANDARDS AND LIMITS

- 5.1. Visible Emissions** Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour.
- 5.2. Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits, as applicable:
 - a. Particulate matter emissions from any fuel burning equipment must not exceed 0.1 grains per standard cubic foot, corrected to 12% CO₂ or 50% excess air.
 - b. Particulate matter emissions from any air contaminant source other than fuel burning equipment and fugitive emission sources must not exceed 0.1 grains per standard cubic foot.
 - c. Non-fugitive particulate matter emissions from any process must not exceed the amount shown in Table 1 of LRAPA Title 32 for the process weight allocated to such a process.
- 5.3. Fuels and Fuel Sulfur Content** The permittee must not use any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used oil.

- a. Fuel oils must not contain more than:
 - i. 0.3% sulfur by weight for ASTM Grade 1 distillate oil;
 - ii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil;
 - iii. 1.75% sulfur by weight for residual oil;
- b. The permittee is allowed to use on-specification used oil as fuel which contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1.

6.0 RECORDKEEPING REQUIREMENTS

6.1. Material Data The permittee must maintain material data sheets for every coating, solvent, or other material processed sufficient to perform mass balance calculations in accordance with condition 3.3.

6.2. Process and Production Records The permittee must maintain the process and production records covered in the following table:

Emissions device or activity	Process or production parameter	Frequency
Facility-wide VOC/HAP-containing Material Usage ¹	Material Usage (Gallons)	Monthly
Facility-wide VOC/HAP-containing Material Usage ¹	Density of Material (Pounds per Gallon)	Per Coating and Solvent ²
Facility-wide VOC-containing Material Usage ¹	VOC Content (% by Weight)	Per Coating and Solvent ²
Facility-wide HAP-containing Material Usage ¹	HAP Content(% by Weight)	Per Coating and Solvent ²

¹Including but not limited to: coatings, lacquers, thinners, stains, topcoats, solvents, gluing, cleaning, and wash-off materials.

²This information shall be supplied from MSDS provided by the manufacturer/supplier of the coatings or solvents.

- 6.3. **Operation and Maintenance** The permittee must maintain records of the dates of inspection and maintenance of paint booth and baghouses.
- 6.4. **Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.
- 6.5. **Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to LRAPA upon request.

7.0 REPORTING REQUIREMENTS

- 7.1. **Annual Report** For each year this permit is in effect, the permittee must submit to the LRAPA by **February 15** the following information for the previous calendar year:
- a. Operating parameters:
 - i. Miscellaneous Coating and Solvent Usage (gallons)
 - ii. VOC/HAP Content per Coating/Solvent (lbs/gal)
 - iii. 12 month rolling total of VOC Emissions (pounds)
 - iv. 12 month rolling total of Aggregate HAP Emissions (pounds)
 - v. 12 month rolling total of Individual HAP Emissions (pounds)
 - vi. Dates of inspection and maintenance of paint booth and baghouses.
 - b. A summary of annual pollutant emissions determined each month in accordance with Condition 3.0.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment

which affected air contaminant emissions.

- e. List major maintenance performed on pollution control equipment.

- 7.2. **Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the LRAPA office as identified in Condition 8.1

8.0 ADMINISTRATIVE REQUIREMENTS

- 8.1. **LRAPA Contacts** Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org. All reports, notices, applications, and inquiries about this permit should be directed to LRAPA office address listed below:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

9.0 FEES

- 9.1. **Annual Compliance Fee** The Annual Fee specified in 37-0020, Table 2, Part 2 for a Simple ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.
- 9.2. **Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in 37-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.
- 9.3. **Special Activity Fees** The special activity fees specified in 37-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.
- 9.4. **Where to Submit Fees** Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3. Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.4. Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 10.5. Other General Conditions** Additional general permit conditions are included in permit attachment A.

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standard
ASTM	American Society for Testing and Materials	NSR	New Source Review
AQMA	Air Quality Maintenance Area	O ₂	oxygen
calendar year	The 12-month period beginning January 1st and ending December 31st	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CO	carbon monoxide	O&M	operation and maintenance
DEQ	Oregon Department of Environmental Quality	Pb	lead
dscf	dry standard cubic foot	PCD	pollution control device
EPA	US Environmental Protection Agency	PM	particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	particulate matter less than 10 microns in size
gal	gallon(s)	ppm	part per million
gr/dscf	grains per dry standard cubic foot	PSD	Prevention of Significant Deterioration
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	PSEL	Plant Site Emission Limit
HVLP	High Volume Low Pressure	PTE	Potential to Emit
I&M	inspection and maintenance	RACT	Reasonably Available Control Technology
lb	pound(s)	scf	standard cubic foot
LRAPA	Lane Regional Air Protection Agency	SER	Significant Emission Rate
MACT	Maximum Available Control Technology	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	TACT	Typically Available Control Technology
NO _x	nitrogen oxides	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12- consecutive calendar months

Attachment A

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request.
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. The permittee shall not discharge from any source whatsoever such quantities of air contamination which cause injury, detriment, public nuisance or annoyance to any persons or to the public or which cause injury or damage to business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]
- G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 33-030(2)]
- G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(2)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are

considered unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:
- a. source name;
 - b. nature of the emissions problem;
 - c. name of the person making the report;
 - d. name and telephone number of the contact person for further information;
 - e. date and time of the onset of the upset condition;
 - f. whether or not the incident was planned;
 - g. equipment involved in the upset or breakdown;
 - h. estimated type and quantity of excess emissions;
 - i. estimated time of return to normal operations;
 - j. efforts made to minimize emissions; and
 - k. description of remedial actions to be taken.

Notification shall be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, shall contain all information required by Condition G15.

- G13. At each reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:
- a. date and time each event was reported to LRAPA;
 - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - c. whether repairs or corrections were made in an expeditious manner when the permittee knew

- or should have known that emission limits were being or were likely to be exceeded;
- d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
 - e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for two (2) calendar years.
[LRAPA 36-025(4)]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior LRAPA approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance shall be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015(1)] The application shall include the following:
- a. reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
 - b. identification of the specific production or emission control equipment or system to be maintained;
 - c. nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
 - d. identification of specific procedures to be followed which will minimize excess emissions.
- G17. No scheduled maintenance which is likely to result in excess emissions shall occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by LRAPA as PM₁₀ Nonattainment Areas. [LRAPA 36-015(6)]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-025(2), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(7)]

Air Pollution Emergencies

- G19. The permittee shall, upon declaration of an air pollution episode, take all actions specified in Tables 1, 2, and 3 of LRAPA's Title 51 (see Attachment A) and shall particularly put into effect the LRAPA-approved preplanned abatement strategy for such condition, if applicable. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee shall notify LRAPA in writing and obtain approval in accordance with LRAPA 34-

035 before:

- a. constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
- b. modifying or altering an existing source that may significantly affect the emissions of air contaminants, or
- c. making any physical change which increases emissions; or
- d. changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

Notification of Name Change

G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

G22. Application for renewal of this permit must be submitted not less than 60 days prior to the permit expiration date. [LRAPA 37-0040]

G23. The procedure for issuance of a permit shall apply to renewal of a permit. If a completed application for a renewal of a permit is filed with LRAPA in a timely manner, prior to the expiration date of the permit, the permit shall not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 37-0040]

Termination Conditions

G24. This permit shall be automatically terminated: [LRAPA 37-0040 and 37-0082]

- a. within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
- b. upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
- c. within one (1) year after a plant closure lasting continuously for one (1) or more years;
- d. upon issuance of a new, renewal, or modified permit for the same operation; or
- e. upon written request of the permittee.

G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, LRAPA shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 37-0082-4]

- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 37-0082-3]
- G27. If LRAPA finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request. [LRAPA 37-0082-4.B]
- G28. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA Title 31]
- G29. The permittee may be required to submit, by April 20 of each year, the emission inventory form provided by LRAPA.

Max/DW/bp [revised 10/24/01, 4/18/06, 3/9/09]

Attachment B
Nine Metal Fabrication and Finishing Source Categories Area Source NESHAP
(subpart XXXXXX) Requirements

The following requirements are based on the National Emission Standards for Hazardous Air Pollutants (HAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories [40 CFR § 63 Subpart XXXXXX]. The permittee must follow all applicable work practice standards, notification, reporting, and recordkeeping requirements for the following metal fabrication activities with the potential to emit metal HAP (MFHAP). Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent cadmium, chromium, lead, or nickel, and greater than 1.0 percent manganese as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. For additional definitions and clarification refer to National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories [40 CFR § 63 Subpart XXXXXX]. Permittee must comply with all applicable requirements of by **July 25, 2011**

REQUIRED MANAGEMENT PRACTICES

Dry Abrasive Blasting

1. For each dry abrasive blasting operation that uses materials that contain MFHAP or has the potential to emit MFHAP, the permittee must comply with the following requirements
 - a. Nonvented, Completely Enclosed Abrasive Blasting [63.11516(a)(1)]
 - i. Minimize dust generation during emptying of abrasive blasting enclosure to reduce MFHAP emissions, as practicable; and
 - ii. Operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.
 - b. Vented, Enclosed Abrasive Blasting [63.11516(a)(2)]
 - i. Capture emissions and vent them to a filtration control device operated according to the manufacturer's instructions.
 - ii. Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
 - iii. Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
 - iv. Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
 - c. Management Practices For Abrasive Blasting Of Objects Greater Than 8 Feet In Any Dimension (No Control Device) [63.11516(a)(3)]
 - i. As an alternative to the requirements under 2 above, the permittee may implement the following management practices:
 1. Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
 2. Enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material;
 3. Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions (and keep these instructions nearby);
 4. Do not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and
 5. When practicable, switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass,

- specular hematite, steel shot, aluminum oxide)
- ii. If the alternative compliance demonstration methods of this section are employed, the permittee must perform the following monitoring for fugitive emissions:
 1. Perform visual determination of fugitive emissions using EPA Method 22 once per day, on each day the process is in operation, during operation of the process.
 2. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(i) of this section for 10 days of work day operation of the process, the frequency of EPA Method 22 testing may decrease to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(i) of this section.
 3. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(ii) of this section, the frequency of EPA Method 22 testing may decrease to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee must resume weekly EPA Method 22 in accordance with paragraph (b)(ii) of this section.
 4. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(iii) of this section, the frequency of EPA Method 22 testing may decrease to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee must resume monthly EPA Method 22 in accordance with paragraph (b)(iii) of this section.
 5. EPA Method 22 tests must be performed while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
 6. If abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension is performed outdoors, the permittee must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.
 7. If abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the permittee must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
 8. If visible fugitive emissions are detected, the permittee must perform corrective actions until the visible fugitive emissions are eliminated, at which time the permittee must perform a follow-up inspection for visible fugitive emissions.

Machining

1. For each machining operation that uses materials that contain MFHAP or has the potential to emit MFHAP, the permittee must comply with the following requirements:
 - a. Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - b. Operate all equipment associated with machining according to manufacturer's instructions.

Dry Grinding and Dry Polishing With Machines [63.11516(b-c)]

1. For each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP or has the potential to emit MFHAP, the permittee must comply with the following requirements:
 - a. Capture emissions and vent them to a filtration control device;
 - b. Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - c. Operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

Painting [63.11516(d)]

1. For each spray painting affected source that spray-applies paint that contains MFHAP, the permittee must comply with the following requirements:
 - a. Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
 - b. All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see § 63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
 - c. The permittee must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain a record of spray paint booth filter maintenance activities.
 - d. As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (1)(a) through (c) of this section.
 - e. All paints applied via spray-applied painting must be applied with a high-volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see § 63.14).
 - f. Maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in § 63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

- g. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.
- h. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (i) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (i) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.
- i. The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (h) of this section. The training program must include, at a minimum, the following items:
 - i. A list of all current personnel by name and job description who are required to be trained;
 - ii. Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - 1. Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - 2. Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - 3. Routine spray booth and filter maintenance, including filter selection and installation.
 - 4. Environmental compliance with the requirements of this subpart.
 - iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (i)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.
- j. All new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained and certified no later than **July 25, 2011**, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (i)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- k. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.
- l. These standards do not apply to affected sources that spray paint objects greater than 15 feet that are not spray painted in spray booths or spray rooms.

1. For each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP, the permittee must comply with the following requirements:
 - a. Operate all equipment, capture and control devices associated with welding operations according to manufacturer's instructions;
 - b. Implement one or more of the following management practices to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment:
 - i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
 - ii. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - iv. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - v. Use a welding fume capture and control system, operated according to the manufacturer's specifications.
 - c. If the permittee's welding operations use 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12 month basis), the permittee must comply with the following requirements:
 - i. The permittee must perform visual determinations of welding fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations. These observations must be performed consistent with the requirements identified for Dry Abrasive Blasting (1)(c)(ii)(1) through (5), above.
 - ii. If visible fugitive emissions are detected during any visual determination required by this section, the permittee must comply with the following requirements:
 1. Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (1)(b) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations.
 2. EPA Method 22 tests must be performed while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
 - iii. If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), the permittee must comply with the following:
 1. Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, conduct a 30 minute EPA Method 9 visual determination of emissions opacity.
 2. In lieu of the requirement of paragraph (c)(i) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform EPA Method 9 visual determinations of emissions opacity in accordance with the following schedule at the primary vent, stack, exit, or opening from the building containing the welding operations:
 - a. Perform visual determination of emissions opacity once per day during each day that the process is in operation.
 - b. If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (c)(iii)(1) of this section does not exceed 20 percent for 10 days of operation of the process, the

- permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee must resume testing every day of operation of the process according to the requirements of paragraph (c)(iii)(1) of this section.
- c. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (c)(iii)(2) of this section does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee must resume testing every five days of operation of the process according to the requirements of paragraph (c)(iii)(2) of this section.
 - d. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (c)(iii)(3) of this section does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (c)(iii)(3) of this section.
 - e. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in paragraphs (c)(i) and (ii) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (c)(3)(ii)(c) and (d) of this section.
- iv. For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six minute average opacities recorded is 20 percent or less but greater than zero, the permittee must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (b) of this section.
 - v. For each visual determination of emissions opacity performed in accordance with paragraph (c)(iii) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee must comply with the following requirements:
 - 1. The permittee must submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report.
 - 2. Within 30 days of the opacity exceedance, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (c)(vi) of this section. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - 3. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform

- visual determinations of emissions opacity, beginning on a daily schedule as specified in § 63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
4. The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (c)(v)(3) of this section, during preparation of the Site-Specific Welding Emissions Management Plan.
 5. The permittee must include these records in the annual certification and compliance report.
- vi. The Site-Specific Welding Emissions Management Plan must comply with the following requirements:
1. The Site-Specific Welding Emissions Management Plan must contain the following information:
 - a. Company name and address;
 - b. A list and description of all welding operations which currently comprise the welding affected source;
 - c. A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - d. A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - e. A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (c)(v)(2) of this section, and the projected date of implementation; and
 - f. Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (c)(vi)(1)(d) and (e) of this section.
 2. The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (c)(vi)(1)(a) through (c) of this section, and submitted with the annual certification and compliance report.
 3. The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in its records in a readily-accessible location for inspector review.

NOTIFICATION, REPORTING & RECORDKEEPING REQUIREMENTS

Notification

1. Initial Notification: The permittee must submit an initial notification no later than **July 25, 2011**. This notice must include the following information:
 - a. The name, address, phone number and e-mail address of the owner and operator;
 - b. The address (physical location) of the affected source;
 - c. An identification of the relevant standard (i.e., this subpart); and
 - d. A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.
2. Notification of Compliance Status: The permittee must submit an initial notification of compliance status no later than **November 22, 2011**. This notice must include the following information:
 - a. The permittee's name and address;
 - b. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the

notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

- c. If the permittee operates any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), "Compliance demonstration," or § 63.11516(e)(4)(ix)(C), "Compliance demonstration," as applicable; and
- d. The date of the notification of compliance status.

Reporting

3. Annual Certification and Compliance Report: The permittee must submit (no later than **January 31**) an annual certification and compliance report containing the following (as applicable):
 - a. Facility information (permittee name and address);
 - b. Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on **December 31**.
 - d. Fugitive emissions report for those affected sources subject to visual determination (Method 22) requirements and containing the following information:
 - i. The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - ii. A description of the corrective actions taken subsequent to the test; and
 - iii. The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
 - e. Opacity report for those affected sources subject to opacity determination (Method 9) requirements and containing the following information:
 - i. The date of every visual determination of emissions opacity;
 - ii. The average of the 6 minute opacities measured by the test; and
 - iii. A description of any corrective actions taken subsequent to the test.
 - f. The exceedance report for any welding affected sources where the opacity exceeded 20 percent, containing the following information:
 - i. The date of which the exceedance occurred; and
 - ii. The average of the 6 minute average opacities recorded during the visual determination.
 - g. If required to maintain a Site Specific Welding Emissions Management Plan, the following must be submitted:
 - i. A copy of the records of daily visual determinations of emissions; and
 - ii. A copy of the Site Specific Welding Emissions Management Plan and any revisions to that plan.

Recordkeeping

4. Records Maintenance: You must maintain records containing the following (as applicable):
 - a. Copies of all notifications and reports, and supporting documentation
 - b. Records of applicability determinations
 - c. Manufacturer's specifications for control devices
 - d. Records relating to visual determinations of fugitive emissions (Method 22) containing the following information:
 - i. The date and results of every visual determination of fugitive emissions;
 - ii. A description of any corrective action taken subsequent to the test, and
 - iii. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
 - e. Records relating to visual determinations of opacity (Method 9) for each affected sources subject to opacity determination requirements and containing the following information:

- i. The date of every visual determination of emissions opacity;
 - ii. The average of the 6 minute opacities measured by the test; and
 - iii. A description of any corrective actions taken subsequent to the test;
- f. Spray paint booth filter records documenting the filter efficiency demonstrations and spray paint booth filter maintenance activities.
 - g. Spray paint delivery system efficiency records documenting HVLP or other high transfer efficiency spray paint delivery systems, including manufacturer's specification for the equipment and manufacturer's operating instructions.
 - h. Spray paint employee training records including the date the initial training and the most recent refresher training was completed.
 - i. Records associated with visual determinations of emissions opacity performed during development or revision of a site-specific welding emissions management plan
 - j. Copy of any site-specific welding emissions management plan
 - k. Copy of the manufacturer's instructions for equipment used for compliance
 - l. Records of welding rod usage, if used to demonstrate that monitoring is not required for a welding affected source, sufficient to document that the permittee uses less than 2,000 pounds per year of welding rod on a rolling 12-month basis.
5. Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.