



ASSIGNMENT TO
GENERAL AIR CONTAMINANT DISCHARGE PERMIT

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

Issued To:

Mohawk Metal
30011 Leghorn Street
Eugene, Oregon 97402

Information Relied Upon:

Application Number: 67320
Dated: July 26, 2021

Plant Site Location:

30011 Leghorn Street
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene
Dated: December 12, 2011

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Subsection 37-0060(2), and based on the land use compatibility findings included in the permit record.


Steven A. Dietrich, Director


Dated

General ACDP Issued in Accordance with LRAPA Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-025	March 31, 2032	Metal Fabrication and Finishing Operations subject to 40 CFR Part 63, Subpart 6X, as adopted under LRAPA Titles 37 and 44.
Rule Citation	LRAPA 37-8010, Table 1, Part B, 78	
SIC	3441	Fabricated Structural Metal
NAICS	332312	Fabricated Structural Metal Manufacturing

SUPPLEMENTAL INFORMATION:

Facility Contact:		
Name:	Mathew Mexicotte	
Title:	Corporate Quality Manager	
Phone number:	541-338-5637	
Email address:	mmexicotte@mohawkmatal.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart XXXXXX (6X)
Reports Required:		
Annual	Yes	February 15
NSPS	No	N/A
NESHAP	No	N/A
Other	N/A	N/A
Public Notice:	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete, and the subject facility qualifies for assignment to the General ACDP.		

CNC 05/31/2022: rr



Permit Number AQGP-025
Expiration Date: March 31, 2032
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LANE REGIONAL AIR PROTECTION AGENCY
GENERAL
AIR CONTAMINANT DISCHARGE PERMIT

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

This permit is issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060.

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

3-31-22

Dated

Metal Fabrication and Finishing Operations; Area sources primarily engaged in one of the following operations: (1) Electrical and Electronic Equipment Finishing Operations; (2) Fabricated Metal Products; (3) Fabricated Plate Work (Boiler Shops); (4) Fabricated Structural Metal Manufacturing; (5) Heating Equipment, except Electric; (6) Industrial Machinery and Equipment Finishing Operations; (7) Iron and Steel Forging; (8) Primary Metal Products Manufacturing; and (9) Valves and Pipe Fittings.

Primarily engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions above, where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value (e.g., revenue generation where other common industry measurements are not applicable) suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to the General Provisions of 40 CFR 63.10(b)(3).

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1. Permit Assignment

Qualifications

- 1.1. The permittee must meet all of the following conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
 - a. The permittee is primarily engaged in one or more of the metal fabrication activities listed on the cover page of this permit, including supporting activities;
 - b. The permittee uses materials that contain or have the potential to emit Metal Fabrication and Finishing Hazardous Air Pollutants (MFHAP). MFHAP are compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. If a material contains any of these MFHAP at the following levels, it is a material containing MFHAP: **0.1 percent by weight of cadmium, chromium, lead, or nickel; 1.0 percent by weight for manganese;**
 - c. The permittee performs one or more of the following operations:
 - i. Dry abrasive blasting performed in a vented enclosure that uses materials that contain MFHAP or has the potential to emit MFHAP;

- ii. Dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that uses materials that contain MFHAP or has the potential to emit MFHAP;
 - iii. Spray-applied painting operation using MFHAP containing paints; or
 - iv. Welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP and uses 2,000 pounds or more of MFHAP containing welding wire and rod (calculated on a rolling 12-month basis).
- d. The source does not qualify for a Basic ACDP and a Simple or Standard ACDP is not required for the source; and
- e. The source is not having ongoing, recurring or serious compliance problems.

Excluded Activities and Operations

- 1.2. For facilities that meet the Qualifications criteria established in Condition 1.1, the following are not subject to this permit or the requirements of this permit:
- a. Research or laboratory activities;
 - b. Tool or equipment repair operations;
 - c. Facility maintenance;
 - d. Quality control activities;
 - e. Operations performed on site at installations owned or operated by the Armed Forces of the United States, the National Aeronautics and Space Administration, or the National Nuclear Security Administration; or
 - f. Operations that produce military munitions manufactured by or for the Armed Forces of the United States, or equipment directly and exclusively used for the purposes of transporting military munitions.

Assignment

- 1.3. LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the qualifications in Condition 1.1, conditions of LRAPA 37-0060, or the Conditions of this permit.

Permitted Activities

- 1.4. Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

Relation to Local Land Use Laws

- 1.5. This permit is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws.

For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

2. General Emission Standards and Limits

Visible Emissions

2.1. The permittee must comply with the following visible emission limits:

- a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than 3 minutes in any one hour; [LRAPA 32-010(3)]
- b. Aggregate times consist of the total duration of all reading during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive; and [LRAPA 32-010(2)]
- c. The visible emission standard in this Condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)]

Fugitive Emissions

2.2. The permittee must comply with the following:

- a. The permittee must take reasonable precautions to prevent particulate matter, including fugitive dust, from becoming airborne from all site operations from which it may be generated. Such reasonable precautions include, but are not limited to: [LRAPA 48-015(1)]
 - i. Controlling vehicle speeds on unpaved roads;
 - ii. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne particulate;
 - iii. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
 - iv. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
 - v. The prompt removal from paved street of earth or other material that may become airborne;
 - vi. Alternative precautions approved by LRAPA.
- b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period; [LRAPA 48-015(2)(a)]
- c. Compliance with the fugitive emissions standard in this Condition is determined by EPA Method 22 at the downwind property boundary; and [LRAPA 48-015(2)(b)]
- d. If requested by LRAPA, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period as determined by EPA Method 22. [LRAPA 48-015(3)]

Particulate Matter Fallout

- 2.3. The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

Nuisance and Odors

- 2.4. The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)]

Startup, Shutdown, and Malfunction Provisions

- 2.5. At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the 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. [40 CFR 63.6(e)]

Malfunctions must be corrected as soon as practicable after their occurrence.

Particulate Emissions

- 2.6. The permittee must comply with applicable grain loading standards for particulate emission limits for non-fugitive emissions pursuant to LRAPA 32-015.

3. NESHAP 6X Applicability

40 C.F.R. Part 63 Subpart XXXXXX – Emission Standards for Nine Metal Fabrication and Finishing Source Categories

- 3.1. The permittee must comply with all applicable provisions of 40 C.F.R. 63.11514 – 63.11523 for all affected emissions to which this subpart applies by the applicable date in 40 C.F.R. 63.11515. The permittee must also comply with all applicable provisions of 40 C.F.R. Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standard, please refer to 40 C.F.R. Part 63, Subpart XXXXXX.

NESHAP Subpart XXXXXX is adopted and incorporated by reference in LRAPA title 44.

4. Operation and Maintenance Requirements

NESHAP Compliance Dates

- 4.1. The permittee must be in compliance with all applicable Conditions of this permit upon initial startup or assignment to this permit, whichever is later.

Dry Abrasive Blasting

- 4.2. The permittee must comply with the requirements in Conditions 4.3 through 4.5, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP or has the potential to emit MFHAP.

These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting. [40 CFR 63.11516(a)]

Dry Abrasive Blasting Performed in Totally Enclosed and Unvented Blast Chambers

- 4.3. For abrasive blasting chambers that are totally enclosed and unvented, the permittee must implement the following management practices to minimize emissions of MFHAP: [40 CFR 63.11516(a)(1)(i)-(ii)]
- a. The permittee must **minimize dust generation during emptying** of abrasive blasting enclosures. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how dust generation is minimized onsite; and [40 CFR 63.11516(a)(1)(i)]
 - b. The permittee must **operate all equipment** associated with dry abrasive blasting operations **according to the manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's written instructions. [40 CFR 63.11516(a)(1)(ii)]

Dry Abrasive Blasting Performed in Vented Enclosures

- 4.4. For dry abrasive blasting operations, which have a vent allowing any air or blast material to escape, the permittee must comply with the following requirements. For dry abrasive blasting operations of items that exceed 8 feet (2.4 meters) in any dimension, the permittee may elect to comply with the requirements in Condition 4.5 in lieu of this Condition unless or until notified by LRAPA in writing that the permittee must comply with this Condition 4.4: [40 CFR 63.11516(a)(2)(i)-(ii)]
- a. The permittee must **capture emissions and vent them to a filtration control device**. The permittee must operate the filtration control device according to manufacturer's instructions and must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's specifications and instructions. for the filtration control devices, as specified by the requirements in Condition 5.4. [40 CFR 63.11516(a)(2)(i)]
 - b. The permittee must minimize emissions of MFHAP by implementing the following management practices: [40 CFR 63.11516(a)(2)(ii)]
 - i. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable and **enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors** that transport abrasive materials. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how excess dust is reduced onsite and having the identified components enclosed; and [40 CFR 63.11516(a)(2)(ii)(A)&(B)]
 - ii. The permittee must **operate all equipment** associated with dry abrasive blasting operations **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's written specifications and instructions. [40 CFR 63.11516(a)(2)(ii)(C)]

Dry Abrasive Blasting of Objects Greater than 8 Feet (2.4 meters) in any One Dimension

4.5. For dry abrasive blasting operations which are performed on objects greater than 8 feet in any one dimension, the permittee may comply with this Condition 4.5 instead of the practices required by Condition 4.4 unless or until notified by LRAPA in writing that the permittee must comply with Condition 4.4. [40 CFR 63.11516(a)(3)(i)-(iv)]

- a. Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are as follows: [40 CFR 63.11516(a)(3)(i)]
 - i. The permittee must **take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and** [40 CFR 63.11516(a)(3)(i)(A)]
 - ii. The permittee must **enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and** [40 CFR 63.11516(a)(3)(i)(B)]
 - iii. The permittee must **operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and** [40 CFR 63.11516(a)(3)(i)(C)]
 - iv. The permittee must **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** [40 CFR 63.11516(a)(3)(i)(D)]
 - v. Whenever practicable, the permittee must **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), where PM is a surrogate for MFHAP. The permittee must demonstrate compliance with this requirement by retaining documentation in the SOP or equivalent that describes the use of high particulate matter-emitting blast media and why it was (or would be) impracticable to use low PM-emitting blast media.** [40 CFR 63.11516(a)(3)(i)(E)]
- b. The permittee must demonstrate compliance with the requirements of Conditions 4.5.a.i, ii, iv, and v by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent). The permittee must demonstrate compliance with the requirements of Condition 4.5.a.iii by maintaining records of, and complying with, the manufacturer's written specifications and instructions.
- c. The permittee must perform visual determinations of fugitive emissions, as specified in Condition 7.2, according to the following, as applicable. [40 CFR 63.11516(a)(3)(ii)]
 - i. For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that 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. [40 CFR 63.11516(a)(3)(ii)(A)]
 - ii. For 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. [40 CFR 63.11516(a)(3)(ii)(B)]
- d. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Condition 8.0. [40 CFR 63.11516(a)(3)(iii)]

- e. 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 comply with the following requirements. [40 CFR 63.11516(a)(3)(iv)]
 - i. The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 7.1. [40 CFR 63.11516(a)(3)(iv)(A)]
 - ii. The permittee must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by Condition 9.3c. [40 CFR 63.11516(a)(3)(iv)(B)]

Machining

- 4.6. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP. Other processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

The permittee must implement management practices to minimize emissions of MFHAP as follows for each machining operation that uses materials that contain MFHAP or has the potential to emit MFHAP: [40 CFR 63.11516(b)]

- a. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how excess dust is reduced onsite; and [40 CFR 63.11516(b)(1)]
- b. The permittee must **operate all equipment associated with machining according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [40 CFR 63.11516(b)(2)]

Dry Grinding and Dry Polishing with Machines

- 4.7. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not subject to this Condition.

The permittee must comply with the following requirements for each fixed and stationary dry grinding and dry polishing machine that does not use lubricating oils or fluids to minimize emissions of MFHAP: [40 CFR 63.11516(c)]

- a. The permittee must **capture emissions and vent them to a filtration control device**. The permittee must demonstrate compliance with this requirement by maintaining a record of, and complying with, the manufacturer's specifications and instructions for the filtration control device(s); and [40 CFR 63.11516(c)(1)]
- b. The permittee must implement management practices to minimize emissions of MFHAP as follows: [40 CFR 63.11516(c)(2)]
 - i. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard

Operating Procedures (or equivalent) that describes how excess dust is minimized onsite; and [40 CFR 63.11516(c)(2)(i)]

- ii. The permittee must **operate all equipment** associated with the operation of dry grinding and dry polishing with machines **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [40 CFR 63.11516(c)(2)(ii)]

Spray Painting

- 4.8. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities. These requirements do not apply to affected sources that spray paint objects greater than 15 feet (4.57 meters) when those objects are not spray painted in spray booths or spray rooms.

The permittee must implement the following management practices when a spray-applied paint that contains MFHAP is being applied: [40 CFR 63.11516(d)(1)]

- a. Spray painting. All spray-applied painting of objects must meet the following requirements.
 - i. 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. [40 CFR 63.11516(d)(1)(i)]
 - ii. All spray booths and spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. If the permittee does not have filter efficiency data from the vendor, the permittee must follow the procedures for demonstrating filter efficiency as described in 40 C.F.R. 63.11516(d)(1)(ii). [40 CFR 63.11516(d)(1)(ii)]
 - iii. 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 documentation of these activities, as detailed in Condition 8. [40 CFR 63.11516(d)(1)(iii)]
 - iv. 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 Conditions 4.8.a.i through 4.8.a.iii. [40 CFR 63.11516(d)(1)(iv)]
- b. Spray painting application equipment of all objects painted. 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 is allowed only after the permittee has obtained written approval from LRAPA or the EPA. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must follow the requirements in 40 C.F.R. 63.11516(d)(2). [40 CFR 63.11516(d)(2)]
- c. Spray gun cleaning. 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, 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. [40 CFR 63.11516(d)(4)]

- d. Spray painting worker certification. 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 Condition 4.8.e. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 4.8.e. The requirements of this condition 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 Condition 4.8.e. The requirements of this condition do not apply to operators of robotic or automated painting operations. [40 CFR 63.11516(d)(5)]
- e. Spray painting training program content. 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 Condition 4.8.d. The training program must include, at a minimum, the following items: [40 CFR 63.11516(d)(6)]
 - i. A list of all current personnel by name and job description who are required to be trained; [40 CFR 63.11516(d)(6)(i)]
 - ii. Hands-on, or in-house, or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics: [40 CFR 63.11516(d)(6)(ii)]
 - 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. [40 CFR 63.11516(d)(6)(ii)(A)]
 - 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. [40 CFR 63.11516(d)(6)(ii)(B)]
 - Routine spray booth and filter maintenance, including filter selection and installation. [40 CFR 63.11516(d)(6)(ii)(C)]
 - Environmental compliance with the requirements of this permit. [40 CFR 63.11516(d)(6)(ii)(D)]
 - 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, if the permittee 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 Condition 4.8.e.ii, they are not required to provide the initial training required by that condition to these painters but must continue to comply with the recertification training. [40 CFR 63.11516(d)(6)(iii)]
- f. Spray painting training dates. As required by Condition 4.8.e, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the following dates. [40 CFR 63.11516(d)(8)]

- i. If the source is a new source, all personnel must be trained and certified no later than 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8.f.ii satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed. [40 CFR 63.11516(d)(8)(i)]
- ii. If the source is an existing source, all personnel must be trained and certified no later than 180 days after hiring. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8.e.ii, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed. [40 CFR 63.11516(d)(8)(ii)]
- g. Duration of training validity. 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. [40 CFR 63.11516(d)(9)]

Welding (All MFHAP welding)

4.9. The permittee must comply with the requirements in Conditions 4.9.a through 4.9.c for all welding operations that uses materials that contain MFHAP or has the potential to emit MFHAP. [40 CFR 63.11516(f)]

- a. The permittee must **operate all equipment, capture devices, and control devices** associated with welding operations **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [40 CFR 63.11516(f)(1)]
- b. The permittee must **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. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes which management practice(s) are implemented onsite. [40 CFR 63.11516(f)(2)]
 - i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG)); [40 CFR 63.11516(f)(2)(i)]
 - ii. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates; [40 CFR 63.11516(f)(2)(ii)]
 - iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation; [40 CFR 63.11516(f)(2)(iii)]
 - 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; [40 CFR 63.11516(f)(2)(iv)]
 - v. Use a welding fume capture and control system according to the manufacturer's specifications and instructions. The permittee must maintain records of, and comply with, written manufacturer's instructions. [40 CFR 63.11516(f)(2)(v)]
- c. The permittee must retain documentation of which management practices are employed on site and the date(s) of any changes to the work practices employed on site.

Welding (2,000 pounds or more of MFHAP wire and rod use per year)

4.10. If the permittee uses 2,000 pounds, or more, per year of welding wire and rod containing MFHAP (calculated on a rolling 12-month basis), the permittee must comply with the following: [40 CFR 63.11516(f)]

- a. **Welding Activity Observations (Tier 1):** The permittee must perform visual determinations of welding fugitive emissions as specified in Condition 7.2 (e.g., daily, weekly, monthly, and quarterly EPA Method 22 schedule) at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep records of all visual determinations in accordance with Condition 8.0. [40 CFR 63.11516(f)(3)]
 - i. **Detecting Visible Emissions From Welding:** If visible fugitive emissions are detected during any visual determination required by Condition 4.10.a, the permittee must perform, and keep record of, 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 Condition 4.9.b. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 7.1 at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(4)&(4)(i)]
 - ii. The permittee must keep records of all visible emission detection instances, corrective actions taken, and results of follow-up observations for visible emissions. This information must be submitted with the annual report. [40 CFR 63.11516(f)(4)(ii)]
- b. **Visible Emission Detection Twice in a 12-month Period (Tier 2):** 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 conduct a visual determination of emissions opacity, as specified in Condition 7.3 (e.g., EPA Method 9) at the primary vent, stack, exit, or opening from the building containing the welding operations. This first opacity observation must be conducted within 24 hours of the end of the visual determination of fugitive emissions. The permittee must now also comply with the following: [40 CFR 63.11516(f)(5)&(5)(i)]
 - i. **Method 9 in lieu of Method 22 Now Required:** In lieu of the requirements of Condition 4.10.a to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with Condition 7.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(5)(ii)]
 - ii. The permittee must keep records of all visual determinations of emissions opacity in accordance with Condition 8.0, along with any subsequent corrective action taken. This information must be submitted with the annual report. [40 CFR 63.11516(f)(5)(iii)&(iv)]
 - iii. **Method 9 Opacity Results above 0% but less than or equal to 20%:** For each visual determination of emissions opacity performed in accordance with Condition 4.10.b that shows opacity of 20 percent or less but greater than zero, the permittee must perform, and keep records of, 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 Condition 4.9.b. [40 CFR 63.11516(f)(6)]
- c. **If Tier 2 Reading Results above 20% (Tier 3):** If any visual determination of emissions opacity performed in accordance with Condition 4.10.b shows opacity greater than 20 percent, the permittee must comply with the following requirements: [40 CFR 63.11516(f)(7)]

- i. **Develop or Revise Welding Management Plan:** The permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Condition 4.10.d, within 30 days of the opacity exceedance. If the permittee already has a Site-Specific Welding Emissions Management Plan, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days. [40 CFR 63.11516(f)(7)(ii)]
 - ii. **Daily Method 9 Readings:** During the 30 day-period for preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must perform daily visual determinations of emissions opacity as specified in Condition 7.3 and 7.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(7)(iii)]
 - iii. The permittee must keep all records of visual determinations of emissions opacity performed during the 30-day Site-Specific Welding Emissions Management Plan preparation period in accordance with Condition 8.0. This information must be submitted with the annual report. [40 CFR 63.11516(f)(7)(iv)]
 - iv. The permittee must report all exceedances of 20 percent opacity with the annual report, in accordance with Condition 9.3. [40 CFR 63.11516(f)(7)(i) &(v)]
- d. **Site-Specific Welding Emissions Management Plan.** The Site-Specific Welding Emissions Management Plan must comply with the following requirements: [40 CFR 63.11516(f)(8)]
- i. The Site-Specific Welding Emissions Management Plan must contain the following information: [40 CFR 63.11516(f)(8)(i)(A)-(F)]
 - Company name and address;
 - A list and description of all affected welding operations;
 - A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - A description of additional management practices and/or fume control methods to be implemented pursuant to Condition 4.9, and the projected date of implementation; and
 - Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries.
 - ii. The following information within the Site-Specific Welding Emissions Management Plan must be updated annually and submitted with the annual report required by Condition 9.3. [40 CFR 63.11516(f)(8)(ii)]
 - iii. The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan onsite in a readily accessible location for review during an inspection, in accordance with the requirements in Condition 8.0. [40 CFR 63.11516(f)(8)(iii) and 40 CFR 63.11519(c)(13)]

5. Risk Mitigation Requirements

Welding Operations

- 5.1. Beginning January 1, 2022, the permittee must install and operate a fume capture and control system compliant with Condition 5.2 before: [LRAPA 37-0069(1) and OAR 340-245-0110]
- a. The permittee uses any welding wire or rod electrode E310, E310-15, or 14Mn-4Cr;
 - b. The permittee uses over 60 pounds of any manganese-containing welding wire or rod in any 24-hour period;
 - c. The permittee uses over 180 pounds of any chromium VI (chrome 6) containing welding wire or rod in a 12 consecutive month period; or
 - d. The permittee uses over 20,000 pounds of any nickel-containing welding wire or rod in a 12 consecutive month period.

Operation

- 5.2. The permittee must operate and maintain the fume capture and control system according to the manufacturer's specifications and recommended procedures. Fume capture and control systems must be one of the following and route emissions to either a high efficiency filter, particulate scrubber, electrostatic precipitator, or activated carbon filter: [LRAPA 37-0069(1) and OAR 340-245-0110]
- a. Torch fume extractor (portable collection and control units);
 - b. Permanent hoods, vents, and ducting; or
 - c. Enclosed welding booths.

Fume Capture and Control System Installation

- 5.3. Permittees required to install and operate a fume capture and control system must submit a Notice of Intent to Construct according to Condition 9.7 before commencing construction or installation of the pollution control equipment. [LRAPA 34-034]

6. Plant Site Emission Limits

Plant Site Emission Limits (PSELs)

- 6.1. Plant site emissions must not exceed the following. [LRAPA 42-0040 and 42-0060]

Pollutant	Limit	Units
PM	24	ton/year
PM10	14	
PM2.5	9	
VOC	39	
Single HAP	9	
Combined HAPs	24	

Annual Period

- 6.2. The annual plant site emissions limits apply to any 12-consecutive calendar month period.

7. Compliance Demonstration

Visual Determination of Fugitive Emissions, General

- 7.1. Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. The permittee must conduct the EPA Method 22 test 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. [40 CFR 63.11517(a)]

Visual Determination of Fugitive Emissions, Graduated Schedule

- 7.2. Visual determinations of fugitive emissions must be performed in accordance with Condition 7.1 and according to the following schedule: [40 CFR 63.11517(b)]
- a. **Daily Method 22 Testing.** Perform visual determination of fugitive emissions **once per day**, on each day the process is in operation, during operation of the process. If observations and records demonstrate that no visible emissions are detected in 10 consecutive daily Method 22 tests, the permittee may elect to comply with Condition 7.2.b in lieu of this 7.2.a. [40 CFR 63.11517(b)(1)]
 - b. **Weekly Method 22 Testing.** If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with Condition 7.2.a for 10 days of work day operation of the process, the permittee may decrease the frequency of Method 22 testing to **once every five days (one calendar week)** of operation of the process. If visible fugitive emissions are detected during these tests, the permittee must resume Method 22 testing once per day during each day that the process is in operation, in accordance with Condition 7.2.a. If observations and records demonstrate that no visible fugitive emissions are detected in four consecutive weekly Method 22 tests, the permittee may elect to comply with Condition 7.2.c in lieu of this 7.2.b. [40 CFR 63.11517(b)(2)]
 - c. **Monthly Method 22 Testing.** If no visible fugitive emissions are detected in four consecutive weekly Method 22 tests performed in accordance with Condition 7.2.b, the permittee may decrease the frequency of Method 22 testing to **once per 21 days (one calendar month)** of operation of the process. If visible fugitive emissions are detected during these tests, the permittee must resume weekly Method 22 in accordance with Condition 7.2.b. If observations and records demonstrate that no visible fugitive emissions are detected in three consecutive monthly Method 22 tests, the permittee may elect to comply with Condition 7.2.d in lieu of this 7.2.c. [40 CFR 63.11517(b)(3)]
 - d. **Quarterly Method 22 Testing.** If no visible fugitive emissions are detected in three consecutive monthly Method 22 tests performed in accordance with Condition 7.2.c, the permittee may decrease the frequency of Method 22 testing 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 Method 22 in accordance with Condition 7.2.c. [40 CFR 63.11517(b)(4)]

Visual Determination of Emissions Opacity for Welding Tier 2 or 3, General

- 7.3. Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test must be thirty minutes. [40 CFR 63.11517(c)]

Visual Determination of Emissions Opacity for Welding Tier 2 or 3, Graduated Schedule

- 7.4. The permittee must perform visual determination of emissions opacity in accordance with Condition 4.10.b and 4.10.c and according to the following schedule. [40 CFR 63.11517(d)]
- a. Daily Method 9 testing for welding, Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in 10 consecutive daily Method 9 tests, the permittee may elect to comply with Condition 7.4.b in lieu of this 7.4.a. [40 CFR 63.11517(d)(1)]
 - b. Weekly Method 9 testing for welding, Tier 2 or 3. If the average of the six minute opacities recorded during any of the daily consecutive Method 9 tests performed in accordance with Condition 7.4.a does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of 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 Condition 7.4.a. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in four consecutive weekly Method 9 tests, the permittee may elect to comply with Condition 7.4.c in lieu of this 7.4.b. [40 CFR 63.11517(d)(2)]
 - c. Monthly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with Condition 7.4.b does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of 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 Condition 7.4.b. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in three consecutive monthly Method 9 tests, the permittee may elect to comply with Condition 7.4.d in lieu of this 7.4.c. [40 CFR 63.11517(d)(3)]
 - d. Quarterly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with Condition 7.4.c does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of Method 9 testing to once per every 3 months 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 Condition 7.4.c. [40 CFR 63.11517(d)(4)]
 - e. Return to Method 22 testing for welding, Tier 2 or 3. If, after two years of quarterly testing (eight observations) according to Condition 7.4.d, the results of all Method 9 tests show no exceedances of 20 percent opacity, the permittee may resume Method 22 testing according to Conditions 7.1 and 7.2.a (daily). In lieu of this, the permittee may elect to continue performing Method 9 tests in accordance with Condition 7.4. [40 CFR 63.11517(d)(5)]

VOC and HAP PSEL Compliance Monitoring for Surface Coating Operations PSEL Compliance Monitoring

- 7.5. Compliance with the VOC and HAP PSELs is determined for each 12-consecutive calendar month period based on material throughput. [LRAPA 42-0080]
- a. Facilities will be presumed to be in compliance with the yearly VOC and HAP PSELs provided total VOC and HAP containing coating and solvent consumption does not exceed 2,500 gallons during any 12-consecutive calendar month period.

- b. If the permittee exceeds the total VOC and HAP containing coating and solvent consumption stated above, the permittee must demonstrate compliance with the yearly VOC and HAP PSELs on a monthly basis as follows:

$$E_{\text{VOC or HAP}} = [\sum (C_X * K_X)] \times 1 \text{ ton/2000 pounds}$$

where,

$E_{\text{VOC or HAP}}$ = VOC or HAP emissions (tons/yr);

$\sum$ = Symbol representing "summation of";

C = Material usage for the period in gallons (gals);

K = VOC or HAP content of the material (pounds/gal);

X = Subscript X represents a specific material.

Other Materials Compliance Monitoring

- 7.6. Compliance with the PM and HAP PSELs for blasting, machining, grinding, polishing, and welding is determined for each 12-consecutive calendar month period based on material throughput or calculated with emission factors in Condition 14 and 15. [LRAPA 42-0080]

- a. The permittee must demonstrate compliance with the yearly HAP PSELs on a monthly basis as follows:

$$E_{\text{HAP}} = [\sum (C_X * K_X)] \times 1 \text{ ton/2000 pounds}$$

where,

E_{HAP} = HAP emissions (tons/yr);

$\sum$ = Symbol representing "summation of";

C = Material usage for the period in pounds (lbs);

K = HAP content of the material (lbs/gal);

X = Subscript X represents a specific material.

- b. The permittee must demonstrate compliance with the yearly PM PSELs on a monthly (or daily) basis, as applicable, as follows:

$$E_{\text{PM/PM10/PM2.5}} = [\sum (C * K)] \times 1 \text{ ton/2000 pounds}$$

where,

$E_{\text{PM/PM10/PM2.5}}$ = PM emissions (tons/yr);

$\sum$ = Symbol representing "summation of";

C = Material usage for the period in 1,000 pounds (lbs);

K = Emission factor from Condition 14 or 15;

8. Recordkeeping Requirements

General Compliance and Applicability Records

- 8.1. The permittee must keep the following records for each affected source. [LRAPA 34-016 and 40 CFR 63.11519(c)]
- a. **Notifications:** Each notification and report that is submitted to comply with this permit, and the documentation supporting each notification and report. [40 CFR 63.11519(c)(1)(i)]

- b. **Determinations:** All applicability determinations listing equipment included in the affected source, as well as any changes and on what date the changes occurred, must be maintained. [40 CFR 63.11519(c)(1)(ii)]
- c. **Manufacturer Documentation:** All manufacturer's specifications, instructions, and recommended maintenance procedures for all control devices and equipment required by Conditions 4.2 through 4.9, as applicable. For all instances in which manufacturer documentation is not available, the permittee must develop, maintain, and comply with site-specific Standard Operating Procedures that are based upon available manufacturer documentation for similar equipment, to the extent possible. [40 CFR 63.11519(c)(4)]
- d. **Material Usage:** The permittee must maintain records of yearly emissions and monthly material usage, as applicable under Condition 7.5 and 7.6 and as follows:
 - i. **Spray Coatings and Solvents:** The permittee must maintain records of each coating and solvent used on a monthly basis and the VOC and HAP content of each.
 - ii. **Fuels:** The permittee must maintain records of fuel usage on a monthly basis for each fuel type used and identify how each fuel was used (e.g., engine, boiler, heater, etc.).
 - iii. **Abrasive Blast Materials:** The permittee must maintain records of abrasive material usage in pounds on a monthly basis for each type of abrasive used. Records must also include whether Condition 4.3, 4.4, or 4.5 were complied with for each material (e.g., X pounds of Y blast material was used complying with Condition 4.3).
 - iv. **Abrasive Blasting Substrate:** The permittee must maintain monthly records of the hours of operation during which abrasive blasting was performed on each substrate that contains differing MFHAP or amounts of MFHAP (i.e., total hours for various substrates may be added together if the MFHAP contents of the substrates are identical). The permittee must also retain the MFHAP content of each substrate blasted.
 - v. **Welding Wire and Rod:** The permittee must maintain records of welding wire and rod usage in pounds on a monthly basis for each welding wire or rod used. The permittee must maintain records of the welding type or process that each wire or rod is used in. If the permittee uses manganese-containing welding wire or rod, the same usage data for this wire and rod must be retained on a daily basis. [40 CFR 63.11519(c)(14)]
- e. **Standard Operating Procedures:** The permittee must maintain a copy of Standard Operating Procedures (or equivalent) that addresses each emissions unit or activity as applicable.

Visual Determination of Fugitive and Opacity Emissions

- 8.2. Maintain a record of the following information for each visual determination of fugitive and opacity emissions in accordance with Condition 7.1 through 7.4: [40 CFR 63.11519(c)(2)-(3)(iii)]
- a. The date and results of every visual determination. For opacity determinations this must include the average of the six-minute opacity as measured by the observation;
 - b. A description of any corrective actions taken after the observations and the date corrective actions were completed; and
 - c. The date and results of any follow-up visual determination performed after the corrective actions were taken.

Spray Painting Activities

8.3. Maintain the following records associated with spray-applied coating activities: [40 CFR 63.11519(c)(5)]

- a. **Booth Filter records** must include:
 - i. Documentation of the filter efficiency determinations or vendor filter efficiency documentation.
 - ii. The filter manufacturer's or vendor's written instructions for operation and maintenance or replacement.
 - iii. Spray paint booth and filter-related maintenance activities, including the dates filter maintenance or replacements are conducted.
- b. **Waterspray or Water Curtain records** must include documentation of compliance with the 98% control requirement. The permittee must also retain manufacturer's written operation and maintenance instructions and records of operations and maintenance in accordance with the manufacturer's documentation. [40 CFR 63.11519(c)(6)]
- c. **HVLP (or other) Documentation and Cleaning records** must include: [40 CFR 63.11519(c)(7)]
 - i. Documentation of HVLP, or other high transfer efficiency spray paint delivery systems, according to Condition 4.8. This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. [40 CFR 63.11516(d)(3) and 40 CFR 63.11519(c)(7)]
 - ii. If the permittee has obtained written approval for an alternative spray application system in accordance with Condition 4.8.b, the permittee must comply with and maintain a record of that approval. The permittee must retain documentation of the demonstration of equivalency for as long as the alternate application method is used on site. [40 CFR 63.11519(c)(7)]
 - iii. An SOP that describes how spray gun cleaning is performed on site in compliance with Condition 4.8.c.
- d. **Employee Training records** must include documentation of the certification for each worker that demonstrates compliance with the training requirements of Condition 4.8.e, including the date the initial training and the most recent refresher training were completed. [40 CFR 63.11516(d)(7) and 40 CFR 63.11519(c)(8)]

Welding Activities

8.4. The permittee must maintain the following records associated with welding activities:

- a. **Site-Specific Welding Management Plan records** must include a record of the most recent site-specific welding emissions management plan and all past versions of the plan, as applicable. [40 CFR 63.11519(c)(12)]
- b. **Visual Determinations During Plan Development:** The permittee must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with Condition 4.10.c, as applicable. [40 CFR 63.11519(c)(11)]

- c. If the permittee is required to install and operate a fume capture and control system in accordance with Condition 5.0, the permittee must retain manufacturer documentation describing operation and maintenance procedures. The permittee must retain documentation demonstrating that these operation and maintenance procedures are followed.

Excess Emissions

- 8.5. The permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.

Retention of Records

- 8.6. Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to LRAPA upon request. The permittee must maintain at least the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review. [40 CFR 63.11178(a) and LRAPA 34-016(5) and 40 CFR 63.11519(c)(15)]

Complaint Log

- 8.7. The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee must investigate the condition within 24 hours, if possible. [LRAPA 34-016(1)]

The log must include at least the following for each complaint or concern received:

- a. The date the complaint was received;
- b. The date and time the complainant states the condition was present;
- c. A description of the complaint;
- d. The location of the complainant or receptor relative to the plant site;
- e. The status of plant operations and activities during the complainant's stated time of pollution or odor condition;
- f. A description of the permittee's actions to investigate the validity of the complaint; and
- g. A description of any actions taken in response to the complaint investigation.

9. Reporting Requirements

Initial Notification

- 9.1. The permittee must submit an Initial Notification in accordance with 40 CFR 63.11519(a)(1) within 120 days after initial startup. A form for this purpose is available from LRAPA. The notification must be submitted to LRAPA and EPA's Region X Office. [40 CFR 63.11519(a)(1)]

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Notification of Compliance Status

- 9.2. The permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.11519(a)(2). A form for this purpose is available from LRAPA. The notification must be submitted to LRAPA and EPA's Region X office. [40 CFR 63.11519(a)(2)]
- a. For existing sources, this notification must be submitted on or before November 22, 2011;
 - b. For new sources, this notification must be submitted within 120 days after initial startup.

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Annual Report

- 9.3. The permittee must prepare and submit one (1) copy of an annual report for the previous calendar year according to the following requirements: [LRAPA 34-016(1)&(2) and 40 CFR 63.11519(b)(1)-(9)]
- a. Dates. The permittee must prepare and submit the annual report no later than **February 15** of each year. [40 CFR 63.11519(b)(2) and 40 CFR 63.10(a)(5)]
 - b. General requirements. The annual report must contain the following information. [40 CFR 63.11519(b)(4)(i)-(iii)]
 - i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31.
 - c. Visual determination of fugitive and opacity requirements. The annual report must contain the following information for each affected source that performs visual determination of fugitive emissions or opacity emissions in accordance with Condition 7.2 or 7.4. [40 CFR 63.11519(b)(5)&(6)]
 - i. The date of every visual determination of fugitive emissions that resulted in detection of visible emissions;
 - ii. The date of every visual determination of emissions opacity and the average of each six-minute opacity determined by the observation;
 - iii. A description of all corrective actions taken subsequent to a visual observation;
 - iv. The date and results of all follow-up visual determinations performed after the corrective actions; and
 - v. As required by Condition 4.10.c.iv, the permittee must include an exceedance report for each instance in which the average opacity during a visual determination exceeded 20 percent. The report must include the date on which the exceedance(s) occurred and what the average opacity was during the visual determination. [40 CFR 63.11519(b)(8)]

- d. Welding wire and rod usage. The total welding rod usage, in pounds, for the previous calendar year. This must include an identification of the specific wire or rod electrode and the specific welding process type in which the material was used. The permittee must state whether any of the thresholds in Condition 5.0 were exceeded. [40 CFR 63.11519(c)(14)]
- e. Fuel usage. The amount of each fuel used, in applicable units, in the previous calendar year. This must include how the fuel was used (e.g., in a backup generator, boiler, heater, etc.).
- f. Abrasive Blasting. The total amount of abrasive material usage, in pounds, for the previous calendar year. This must include whether each type of blast material was used in a totally enclosed chamber, vented enclosure, or, for objects larger than 8 feet in any one dimension, a certification that the permittee complied with Condition 4.4 or 4.5.
 - i. The permittee must include the total hours of operation during which abrasive blasting was performed on each substrate that contains MFHAP for each substrate with different MFHAP or amounts of MFHAP, according to Condition 8.1.d.iv. The permittee must include the MFHAP content of each substrate blasted.
- g. Site-specific Welding Emissions Management Plan reporting. The permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 4.10.c.ii. The permittee must submit a copy of the updated Site-Specific Welding Emissions Management Plan as required by Condition 4.10.d.ii. [40 CFR 63.11519(b)(9)]
- h. Emissions or coating and solvent usage. Annual VOC and HAP containing coating and solvent usage or annual emissions, as applicable (see Condition 7.5 or 7.6).

Excess Emissions

- 9.4. The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.
 - a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 10.3.
 - b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by LRAPA.

Initial Startup Notice

- 9.5. The permittee must notify LRAPA in writing of the date a newly permitted source is first brought into normal operation. The notification must be submitted no later than seven (7) days after the initial startup.

Notice of Change of Ownership or Company Name

- 9.6. The permittee must notify LRAPA in writing using an LRAPA "Permit Application Form" within 60 days after any of the following: [LRAPA 37-0030(4)]
 - a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.

Construction or Modification Notices

- 9.7. The permittee must notify LRAPA in writing using an LRAPA "Notice of Construction Form," or other permit application form, and obtain approval in accordance with LRAPA title 34 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions; [LRAPA 34-034(1)]
 - b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or [LRAPA 34-034(2)]
 - c. Constructing or modifying any air pollution control equipment. [LRAPA 34-034(3)]

Where to Send Reports and Notices

- 9.8. Reports and notices, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 10.2 unless otherwise specified.

10. Administrative Requirements

Reassignment to the General ACDP

- 10.1. A permittee that wishes to continue assignment to this General ACDP must submit to LRAPA an application for reassignment as follows:
- a. The application must be received by LRAPA within 30 days prior to the expiration date listed on this permit; [LRAPA 37-0040(2)(c)]
 - b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application. [LRAPA 37-0082(1)(b)]

LRAPA Address

- 10.2. All reports, notices, applications, and fees must be directed to LRAPA as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
541-736-1056

LRAPA Website

- 10.3. Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

11. Fees

Annual Compliance Fee

- 11.1. The annual fees specified in LRAPA 37-8020, Table 2 for a General ACDP are due on or by **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 this date.

Change of Ownership or Company Name Fee

- 11.2. The Non-Technical Permit Modification specific activity fee specified in LRAPA Section 37-8020, Table 2, Part 4.a. is due with an application for changing the ownership or the name of the company for a source assigned to this permit. Forms that require fees must be sent together to the LRAPA address as identified in Condition 10.2.

Where to Submit Fees

- 11.3. Fees, with a permit number prominently displayed, must be sent to the LRAPA address as identified in Condition 10.2:

12. General Conditions and Disclaimers

Other Regulations

- 12.1. In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by LRAPA. [ORS 468A.060 and LRAPA 12-001(2)]

Conflicting Conditions

- 12.2. In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

Masking of Emissions

- 12.3. The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050]

LRAPA Access

- 12.4. The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with LRAPA Section 13-020. [ORS 468.095(1) and LRAPA 13-020(1)(h)]

Permit Availability

- 12.5. The permittee must have a copy of the permit available at the facility at all times. [LRAPA 37-0020(3)]

Outdoor Burning

- 12.6. The permittee must not conduct any outdoor burning except as allowed by LRAPA title 47. [LRAPA 47-015(4)&(5)]

Asbestos

- 12.7. 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.

Property Rights

12.8. 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.

Termination, Revocation, Rescission, or Modification

12.9. LRAPA may modify or revoke this permit pursuant to LRAPA Sections 37-0082 and 37-0084.

13. Abbreviations, Acronyms, and Definitions

ACDP	Air Contaminant Discharge Permit	Mn	Manganese
AQGP	Air Quality General Permit	MSDS	Material safety data sheet
AQMA	Air Quality Maintenance Area	NESHAP	National Emissions Standards for Hazardous Air Pollutants
calendar year	The 12-month period beginning January 1st and ending December 31 st	Ni	Nickel
CAO	Cleaner Air Oregon	NO _x	nitrogen oxides
Cd	cadmium	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CO	carbon monoxide	Pb	lead
Cr	chromium	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
EPA	US Environmental Protection Agency	PM _{2.5}	particulate matter less than 2.5 microns in size
FCAW	Flux cored arc welding	PSEL	Plant Site Emission Limit
ft ³	cubic feet	SAW	Submerged arc welding
Gal	gallon(s)	SCC	Source Classification Code
GMAW	Gas metal arc welding	SDS	Safety data sheet
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	SIC	Standard Industrial Code
HVLP	High Volume Low Pressure	SMAW	Shielded metal arc welding
lb	pound(s)	SO ₂	sulfur dioxide
LRAPA	Lane Regional Air Protection Agency	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

14. PM Emission Factors for Welding

All emission factors are applicable to PM, PM10, and PM2.5. For permittees that use fume capture and control device(s), manufacturer documentation regarding capture and control efficiency may be cited to report a lower emission factor as applicable.

Welding Process	Electrode Type(s)	Last two digits of SCC	Emission Factor	Emission Factor Units
SMAW (SCC 3-09-051)	14Mn-4Cr	(-04)	81.6	lbs/1,000 lbs of electrode consumed
	E11018, E11018-M	(-08)	16.4	
	E308, E308-16, E308L-15	(-12)	10.8	
	E310, E310-16	(-16)	15.1	
	E316, E316-15, E316-16, E316L-16	(-20)	10.0	
	E410, E410-16	(-24)	13.2	
	E6010	(-28)	25.6	
	E6011	(-32)	38.4	
	E6012	(-36)	8.0	
	E6013	(-40)	19.7	
	E7018	(-44)	18.4	
	E7024	(-48)	9.2	
	E7028	(-52)	18.0	
	E8018, E8018C3	(-56)	17.1	
	E9015, E9015B3	(-60)	17.0	
	E9018, E9018B3, E9018G	(-64)	16.9	
	ECOCr, ECoCr-A	(-68)	27.9	
	Eni-Cl	(-72)	18.2	
	ENiCrMo, ENiCrMo-4	(-76)	11.7	
	Eni-Cu, Eni-Cu-2	(-80)	10.1	
GMAW (SCC-3-09-052)	E308L	(-12)	5.4	lbs/1,000 lbs of electrode consumed
	E70S	(-54)	5.2	
	ER1260	(-10)	20.5	
	ER5154	(-26)	24.1	
	ER316	(-20)	3.2	
	ERNiCrMo	(-76)	3.9	
	ERNiCu	(-80)	2.0	
FCAW (SCC 3-09-053)	E110, E110TS-K3	(-06)	20.8	lbs/1,000 lbs of electrode consumed
	E11018	(-08)	57.0	
	E308LT, E308LT-3	(-12)	9.1	
	E316LT, E316LT-3	(-20)	8.5	
	E70T, E70T-1, E70T-2, E70T-4, E70T-5, E70T-7, E70T-G	(-54)	15.1	
	E71T, E71T-1, E71T-11	(-55)	12.2	
SAW (SCC 3-09-054)	EM12K, EM12K1, F72-EM12K2	(-10)	0.05	lbs/1,000 lbs of electrode consumed

15. PM Emission Factors for Abrasive Blasting

Activity	Pollutant	Emission Factor	Emission Factor Units
Sand Blasting	PM	57.6 ¹	lbs/1,000 pounds of abrasive used
	PM ₁₀	13	
	PM _{2.5}	1.3	
Grit Blasting ²	PM	13.8	lbs/1,000 pounds of abrasive used
	PM ₁₀	3.1	
	PM _{2.5}	0.3	
Shot Blasting ²	PM	5.76	lbs/1,000 pounds of abrasive used
	PM ₁₀	1.3	
	PM _{2.5}	0.13	
Abrasive Blasting w/ Fabric Filter Control	PM/PM ₁₀ /PM _{2.5}	0.69	lbs/1,000 pounds of abrasive used

1: Total PM emissions are variable based on windspeed, between 27 and 91 lb/1,000 lbs of abrasive, 57.6 is the mean of available emission factor data that accounts for varying windspeed throughout the year at the source.

2: AP-42 estimates that Grit Blasting emits 24% and Shot Blasting emits 10% of total Sand Blasting PM.



Lane Regional Air Protection Agency

GENERAL AIR CONTAMINANT DISCHARGE PERMIT ASSESSMENT REPORT

METAL FABRICATION AND FINISHING

Mohawk Metal

Source No. 205194

30011 Leghorn Street

Eugene, Oregon 97402

Website: <https://www.mohawkmetal.com/>

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from metal fabrication facilities subject to the Nine Metal Fabrication and Finishing NESHAP (40 CFR part 63 subpart XXXXXX). The Nine Metal Fabrication and Finishing NESHAP regulates facilities primarily engaged in the following operations that use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead.

SIC Code	Description
3462	Iron and Steel Forging Iron and Steel Forging
3499	Fabricated Metal Products, NEC Fabricated Metal Products, NEC
3441	Fabricated Structural Metal Manufacturing Fabricated Structural Metal Fabrication
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3399	Primary Metals Products Manufacturing Primary Metals Products Manufacturing
3494	Valves and Pipe Fittings, NEC Valves and Pipe Fittings, NEC
3499	Fabricated Metal Products, NEC Fabricated Metal Products, NEC
3531	Industrial Machinery & Equipment: Finishing Ops Construction Machinery Manufacturing
3533	Industrial Machinery & Equipment: Finishing Ops Oil and Gas Field Machinery Equipment Manufacturing
3433	Heating Equipment, except electric Heating Equipment, except electric
3561	Industrial Machinery & Equipment: Finishing Ops Pumps and Pumping Equipment Manufacturing
3621	Electrical & Electronic Equipment Finishing Ops Motors and Generators Manufacturing
3699	Electrical & Electronic Equipment Finishing Ops Electrical Machinery, Equipment, and Supplies, NEC

*Note: SIC codes can be used to determine regulatory applicability. NAICS codes alone cannot be used to determine applicability for Lane County sources.

2. Mohawk Metal is assigned to this General Permit because SIC 3441/NAICS 332312 for “Fabricated Structural Metal Manufacturing” is the classification for which LRAPA believes applies to the facility and the facility is primarily engaged in metal fabrication operations that fall under the Nine Metal Fabrication and Finishing NESHAP.
3. Mohawk Metal is not assigned to any other General ACDP or General ACDP Attachment.
4. This General Permit does not apply to:
 - Research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA)
 - Tool or equipment repair operations, facility maintenance, or quality control activities as defined in 40 CFR 63.11522
 - Operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration
 - Operations that produce military munitions, as defined in 40 CFR 63.11522, or equipment directly and exclusively used for the purposes of transporting military munitions.
5. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities as defined under LRAPA title 12. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
6. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.
7. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

8. Facilities assigned to this General Permit are sources of particulate matter (PM) and

hazardous air pollutant (HAP) emissions. These facilities may also be sources of volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxides (NO_x) and sulfur dioxides (SO₂) emissions.

9. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources of federal hazardous air pollutants and compliant with applicable emission limits.
10. LRAPA has assessed the level of emissions from these facilities and determined that facilities assigned to this permit do not have the potential to emit at or above the established Significant Emission Rates (SERs) stated in Table 2 of LRAPA title 12 for carbon monoxide, nitrogen oxides, particulate matter, PM₁₀ and sulfur oxides. However, facilities assigned to this permit will be required to track and report abrasive material, welding rod and wire, fuel usage, and the amount of metal processed. If LRAPA determines that facilities assigned to this permit have the potential to emit at or above the established levels of concern, the permit will be revised to ensure that these facilities emit at or below the levels of concern.

FACILITY DESCRIPTION

11. At Mohawk Metal, all metal fabrication and machining is done in one building. There are wall vents with fans for general ventilation, but no controls for the general building air. There is a paint booth at the facility that is functional, but Mohawk Metal outsources the majority of their painting, and the paint booth is often used for material storage.

FACILITY EMISSION UNITS

12. The facility has the following equipment and/or activities regulated by the permit:

EU	Control Device
Fiber Lasers (2)	Baghouses (2)
CO ₂ laser	Baghouse
Hand plasma cutter	NA
Approximately 12 hand welders	NA
Paint Booth	NA

SPECIFIC AIR PROGRAM APPLICABILITY

13. Facilities assigned to this General Permit are subject to the general visible emissions

standards, nuisance requirements (control of fugitive dust and odors) in LRAPA titles 32, 48, and 49. The permit contains requirements and limitations to ensure compliance with these standards.

14. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 CFR part 63 subpart XXXXXX, for Metal Fabrication and Finishing Facilities. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on April 3, 2008. The NESHAP is adopted in LRAPA title 44.
15. The Nine Metal Fabrication and Finishing NESHAP contains options for graduated schedules of visual determination of fugitive emissions (Condition 7.2) and visual determination of opacity for welding emissions (Condition 7.4). The language of the NESHAP appears to assume a five (5) day work week and is not clear how the graduated schedule works for a six (6) or seven (7) day work week. LRAPA interprets the rule to be either, once every five days or one calendar week of operation (Condition 7.2.b and Condition 7.4.b). This interpretation carries forward to the monthly, (once every 21 days or one month of operation) (Condition 7.2.c and Condition 7.4.c), and quarterly testing, (once per 60 days or 3 months of operation) (Condition 7.2.d and Condition 7.4.d), as well.
16. Oregon DEQ conducted a general activity-based risk screening for metal fabrication and finishing sources assigned to their General Permit for facilities subject to the Nine Metal Fabrication and Finishing NESHAP. Facilities that conduct welding activities using the specified materials above thresholds are required to utilize a fume capture and control system before exceeding the applicable threshold.

COMPLIANCE ASSURANCE

17. Permittees are required to maintain records of notifications, production, compliance, visual emission determinations, manufacturer's specifications for equipment, spray paint and booth production and maintenance, material usage, work practice activities, and complaints received at the facility related to air pollution concerns. These items are reported to LRAPA annually, as applicable.
18. LRAPA staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.
19. Under the authority of 40 CFR 63.10(a)(5), LRAPA has changed the annual report due date from January 31 to February 15.

REVOCATION OF ASSIGNMENT

20. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

21. General Air Contaminant Discharge Permits are authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public was provided at least 30 days to submit written comments on the draft General Permit and may request a public hearing. There was one set of comments from one commenter during the public notice period. The comment and response are summarized in item 22 below.

COMMENTS AND RESPONSES

22. The following is a summary of the comments received during the public comment period and LRAPA's response.

Comment	What specific companies will be affected by this action? To whom would reissuances of the permits be aimed? What facilities have been working under the previous types of permits?
Response	There are six facilities that are be affected by this change, and they are all currently permitted under the AQGP-025 permit type. Those facilities are: Clarke's Sheet Metal, Inc. Emerald Steel Fabricators. Inc. General Trailer Parts LLC Gibson Steel Fabrication Inc. Holte Manufacturing Mohawk Metal

DEFINITIONS

23. The terms not defined in the General Permit use the definitions found in LRAPA title 12 or 40 CFR part 63 subpart XXXXXX.