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Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Description
R1	xx/xx/2015	10/31/2015	Renewal	Permit renewal
NA	11/05/2001	08/26/2001	Initial	Initial issuance

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-0.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances

1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit U1**U1: Paint Booths for coating metals**

A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain Metal Fabrication and Finishing HAP (MFHAP), including all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). (40 CFR 63.11514 (b)(4))

U1 Applicable Regulations

Regulation	Title	Applicable Sections
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants.	1, 2, and 4.129
5.14	Hazardous Air Pollutants and Source Categories	1 through 5
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
6.31	Standard of Performance for Existing Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7
7.08	Standards of Performance for New Process Operations	1, 2 and 3
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7
40 CFR 63 Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	§§ 63.11514 through 63.11517, 63.11519, 63.11521, 63.11522

U1 Equipment

EP ID	Description, Make/Model	Applicable Regulation(s)	Control ID	Stack ID
E-1	Wet paint booth, DeVilbiss, Double Station (Previous Permit 199-01-O)	6.09, 6.31, 40 CFR 63 Subpart XXXXXX	C-1a, C-1b	S-1a, S-1b
E-2	Wet paint booth, DeVilbiss (Previous Permit 200-01-O)	5.14, 7.08, 7.59, 40 CFR 63 Subpart XXXXXX	C-2	S-2
E-3	Wet paint booth, DeVilbiss (Previous Permit 201-01-O)		C-3	S-3
E-4	Wet paint booth, DeVilbiss (Previous Permit 202-01-O)		C-4	S-4
E-5	Wet paint booth, DeVilbiss (Previous Permit 202-01-O)		C-5	S-5
E-6	Wet paint booth, custom (Previous Permit 203-01-O)		C-6	S-6
E-7	Wet paint booth, DeVilbiss (Previous Permit 203-01-O)		C-7	S-7
E-8	Wet paint booth, Blowtherm (Previous Permit 184-04-O)		C-8	S-8
E-9	Wet paint booth, Blowtherm (Previous Permit 184-04-O)		C-9	S-9
E-10a	Powder paint system (Previous Permit 204-01-O)		7.08, 7.59	C-10a
E-10b	Powder paint system	7.08, 7.59	C-10b	NA

U1 Controls

Control ID	Description	Control Efficiency
C-1a, C-1b, C-2 through C-10a	Fabric filter, cartridge	98%
C-10b	Fabric filter, cartridge	98%

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. The owner or operator shall not exceed 25 tons of VOC emissions per year including all coatings, additives, catalysts, solvents, thinners, and cleaners.¹ (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)
- ii. No coating shall be used with a VOC content, as applied, in excess of the following limits during a calendar month averaging period: (Regulations 6.31, Section 3.1, and 7.59, Section 3.1)

Coating	VOC lb/gal	VOC kg/l
Clear coatings	4.3	0.52
Air-dried coatings	3.5	0.42
Extreme performance coatings	3.5	0.42
All other coatings	3.0	0.36

b. PM/PM₁₀

- i. For emission points E2 through E10b, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr based on actual operating hours in a calendar day. (7.08, Section 3.1.2)^{2,3}
- ii. For emission point E1, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr based on actual operating hours in a calendar day. (Regulation 6.09, section 3.2)²
- iii. The owner or operator shall not exceed 25 tons of PM/PM₁₀ plant-wide emissions per consecutive 12-month period.¹ (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)
- iv. For powder coater E-10a & E-10b, the owner or operator shall operate and maintain the control devices at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions. (Regulation 6.09, section 3.2 and Regulation 7.08, section 3.1.2.)³

c. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulations 6.09, Section 3.1, and 7.08, Section 3.1.1)

¹ The source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

² Using HVLP spray guns (transfer efficiency of 65%), the percent solids of the material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.

³ Powder Coater E-10a and E-10b can meet the PM standard (Regulation 7.08) controlled.

d. HAP

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)⁴
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. Regulation 2.17, section 5.1 and (Regulation 5.00, section 1.13.5.3)⁴
- iii. The owner or operator shall not use more than one ton of MeCl for paint stripping operations.
- iv. *Standards for control of MFHAP in spray painting.* The owner or operator must implement the management practices in the following paragraphs when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain Metal Fabrication and Finishing HAP (MFHAP) are being applied. (40 CFR 63.11516(d))⁵
 - 1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of the following paragraphs. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in 40 CFR 63 6X Table 1 or affected sources that spray paint objects greater than 15 feet, that are not spray painted in spray booths or spray rooms. (40 CFR 63.11516(d)(1))
 - (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. (63.11516(d)(1)(i))
 - (b) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98% 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,

⁴ The source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

⁵ Affected source(s) subject to 40 CFR 63.11514(b)(4) as a spray painting affected source are not subject to the miscellaneous surface coating provisions of subpart HHHHHH, "NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources." 40 CFR 63 Subpart HHHHHH (§63.11169(d)(6)) does not apply to surface coating activities that are covered under another area source NESHAP.

“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. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. (63.11516(d)(1)(ii))

- 2) 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 % control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of §§63.11516(d)(1)(i) through (iii).
- 3) *Standards for spray painting application equipment of all objects painted for MFHAP control.* 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, Sep. 26, 2002”, Revision 0 (incorporated by reference, see §63.14). (40 CFR 63.11516(d)(2))
- 4) *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 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. (40 CFR 63.11516(d)(4))

- 5) *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 §63.11516(d)(6). The spray application of paint is prohibited by persons who are not certified as having completed the training described in §63.11516(d)(6). 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. (40 CFR 63.11516(d)(5))
- 6) *Spray painting training program content.* The owner or operator 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 §63.11516(d)(5). The training program must include, at a minimum, the items listed in §§63.11516(d)(6)(i) through (iii). (40 CFR 63.11516(d)(6))
- (a) A list of all current personnel by name and job description who are required to be trained;
 - (b) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in §§63.11516(d)(6)(ii)(A) through (D).
 - (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.
 - (c) 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 S1.d.iv.6)(b) are not

required to provide the initial training required by that paragraph to these painters.

- (d) *Spray painting training dates.* As required by §63.11516(d)(5), 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 §63.11516(d)(6)(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) and 40 CFR 63.11516(d)(8)(ii))

- 7) *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 §63.11516 and be re-certified every 5 years. (40 CFR 63.11516(d)(9))

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. VOC

- i. An owner or operator of an affected facility subject to this regulation shall monthly maintain records that include, but not be limited to, the following: (Regulations 6.31, Section 6.1, and 7.59, Section 6.1)
- 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
 - 2) The application method and substrate type (metal, plastic, etc.),
 - 3) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the month.
 - 4) The VOC content as applied in each coating and solvent,
 - 5) The date, or usage record period, for each application of coating and solvent,
 - 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the month.
- ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulations 6.31, Section 6.2, and 7.59, Section 6.2)

- iii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. each month.
 - iv. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month.
- b. **PM/PM₁₀**
- i. The owner or operator shall inspect the filters in the paint booth(s) at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
 - ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.
 - iii. For powder coater E-10a & E-10b:
 - 1) The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.
 - 2) If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:
 - (a) Date;
 - (b) Start time and stop time;
 - (c) Identification of the control device and process equipment;
 - (d) The type and amount of product transferred for the day that the bypass occurred;
 - (e) Hours of operation of the equipment for the day the bypass occurred;
 - (f) PM emissions during the bypass in lb/hr;
 - (g) Summary of the cause or reason for each bypass event;
 - (h) Corrective action taken to minimize the extent or duration of the bypass event; and
 - (i) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event
 - iv. The owner or operator shall monthly calculate and record the 12-consecutive month PM/PM₁₀ emissions for each month.
- c. **Opacity**
- See Specific Condition S2.b.
- d. **HAP**
- i. The owner or operator shall keep a record of the MSDS for each raw material.
 - ii. *General compliance and applicability records.* Maintain information specified in the following paragraphs. (40 CFR 63.11519(c)(1))

- 1) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. (40 CFR 63.11519(c)(1)(i))
 - 2) Records of the applicability determinations listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time. (40 CFR 63.11519(c)(1)(ii))
- iii. *Spray paint booth filter records.* The owner or operator 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 the filter efficiency demonstrations and spray paint booth filter maintenance activities. (40 CFR 63.11516(d)(1)(iii) and 40 CFR 63.11519(c)(5))
- iv. *Waterspray booth or water curtain efficiency tests.* The owner or operator must maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms." (40 CFR 63.11519(c)(6))
- v. *HVLP or other high transfer efficiency spray delivery system recordkeeping.* The owner or operator must maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3). This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2), you must maintain a record of that approval along with documentation of the demonstration of equivalency. (40 CFR 63.11516(d)(3) and 40 CFR 63.11519(c)(7))
- vi. *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* The owner or operator must maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), with the date the initial training and the most recent refresher training was completed. (40 CFR 63.11516(d)(7) and 40 CFR 63.11519(c)(8))
- vii. *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review. (40 CFR 63.11519(c)(13))
- viii. Your records must be maintained according to the requirements below. (40 CFR 63.11519(c)(15))
- 1) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate,

the records may be maintained as electronic spreadsheets or as a database. (40 CFR 63.11519(c)(15)(i))

- 2) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record. (40 CFR 63.11519(c)(15)(ii))
- 3) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record, according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years. (40 CFR 63.11519(c)(15)(iii))

- ix. The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **VOC**

The owner or operator shall report the plant-wide consecutive 12-month plant-wide VOC emissions for each month in the reporting period.

b. **PM/PM₁₀**

- i. The owner or operator shall report the following information regarding PM bypasses:
 - 1) Number of times the PM vent stream bypasses the control device and is vented to the atmosphere;
 - 2) Duration of each bypass to the atmosphere;
 - 3) Calculated pound per hour PM emissions for each bypass; or
 - 4) A negative declaration if no bypasses occurred.
- ii. The owner or operator shall report the consecutive 12-month PM/PM₁₀ emissions for each emission point for each month in the reporting period.

c. **Opacity**

See Specific Condition S3.b.

d. **HAP**

- i. The owner or operator shall submit annual certification and compliance reports, according to the applicable requirements of §63.11519(b)(2) through (b)(7)⁶. (40 CFR 63.11519(b)(1))
 - 1) The owner or operator shall submit each annual certification and compliance report according no later than January 31 and kept in a readily-accessible location for inspector review. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each

⁶ The initial notification of compliance status for 40 CFR 63 Subpart XXXXXX was received July 23, 2011 and revised February 1, 2012. The notification of compliance status was received November 29, 2011.

- monthly calculation. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31. (40 CFR 63.11519(b)(2) and 40 CFR 63.11519(b)(2)(iii))
- 2) The annual certification and compliance report must contain the information specified in §§63.11519(b)(4)(i) through (iii), and (b)(5) through (7) that is applicable to each affected source. (40 CFR 63.11519(b)(4))
 - (a) Company name and address; (40 CFR 63.11519(b)(4)(i))
 - (b) 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 (40 CFR 63.11519(b)(4)(ii))
 - (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. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each (40 CFR 63.11519(b)(4))
 - ii. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

Emission Unit U2**U2 Blasting, Machining, Grinding, Polishing, Descaling****U2 Applicable Regulations**

Regulation	Title	Applicable Sections
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants.	1, 2, and 4.129
5.14	Hazardous Air Pollutants and Source Categories	1 through 5
7.08	Standards of Performance for New Process Operations	1, 2 and 3
40 CFR 63 Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	§§ 63.11514 through 63.11517, 63.11519, 63.11521, 63.11522

U2 Equipment

Emission Point ID	Description Make/Model	Construction Date	Applicable Regulation	Control ID	Stack ID
E-11	Vertical Descaling Machine, Pangborn, Model ES-1860 (Previous Permit 226-01)	1998	5.14, 7.08, 40 CFR 63 Subpart XXXXXX	C-11	NA
E-12	Glass bead cabinet blaster, Trinco	2009		DC-1	NA
E-13	Glass bead cabinet blaster, Clemco	2010		DC-2	NA
E-14	Laser cutting machine	2010		DC-3	NA
E-15	Laser cutting machine, Trumf, Tru Flow 5000	2014		DC-4	NA
E-16	Laser cutting machine, Trumf, Tru Flow 5000	2014		DC-5	NA

U2 Controls

Control ID	Description	Control Efficiency
DC-1	Dust collector, Trincco, Model BP	98%
DC-2	Dust collector, Donaldson Torit, Model DFO2-8	98%
DC-3	Dust collector, Handte, Model MF-L 40/8/1	99.9%
C-11	Dust collector, pulse jet 4-cartridge filter, Pangborn Model 2PC4 (Previous Permit 227-01)	98%
DC-4	Dust Collector, Handt, Model MF-L 2,000	98%
DC-5	Dust Collector, Handt, Model MF-L 2,000	98%

U2 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM/PM₁₀

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment based on actual operating hour in a calendar day. (Regulation 7.08, Section 3.1.2)⁷
- ii. The owner or operator shall not exceed 25 tons of PM/PM₁₀ emissions per consecutive 12-month period.⁸ (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, Section 3.1.1)

c. HAP

Single and Total HAPs

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)⁸
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.3)⁸

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- iii. *Standards for dry abrasive blasting of objects performed in vented enclosures.* The owner or operator shall comply with the requirements in the following paragraphs for a dry abrasive blasting operation which has a vent allowing any air or blast material to escape. (40 CFR 63.11516(a)(2))
 - 1) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions. (40 CFR 63.11516(a)(2)(i))
 - 2) You must implement the management practices to minimize emissions of MFHAP as specified in the following paragraphs. (40 CFR 63.11516(a)(2)(ii))
 - (a) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and (40 CFR 63.11516(a)(2)(ii)(A))

⁷ The equipment subject to Regulation 7.08 cannot exceed the standard uncontrolled.

⁸ The source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

- (b) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and (40 CFR 63.11516(a)(2)(ii)(B))
 - (c) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions. (40 CFR 63.11516(a)(2)(ii)(C))
 - iv. *Standards for machining.* The owner or operator shall comply with the following paragraphs for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, or has the potential to emit MFHAP. 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. (40 CFR 63.11516(b))
 - 1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and (40 CFR 63.11516(b)(1))
 - 2) You must operate all equipment associated with machining according to manufacturer's instructions. (40 CFR 63.11516(b)(2))
 - v. *Standards for dry grinding and dry polishing with machines.* The owner or operator shall comply with the requirements in the following paragraphs for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, or has the potential to emit MFHAP. 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. (40 CFR 63.11516(c))
 - 1) You must capture emissions and vent them to a filtration control device. (40 CFR 63.11516(c)(1))
 - 2) You must implement management practices to minimize emissions of MFHAP as specified in the following paragraphs. (40 CFR 63.11516(c)(2))
 - (a) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and (40 CFR 63.11516(c)(2)(i))
 - (b) You must 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. (40 CFR 63.11516(c)(2)(ii))
- S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)
- Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **PM/PM₁₀**

- i. The owner or operator shall monthly calculate and record the 12-consecutive month PM/PM₁₀ emissions for each month.
- ii. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

b. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **HAP**

Single and Total HAPs

- i. The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

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- ii. *General compliance and applicability records.* Maintain information specified in the following paragraphs. (40 CFR 63.11519(c)(1))
 - 1) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. (40 CFR 63.11519(c)(1)(i))
 - 2) Records of the applicability determinations listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be

made available for inspector review at any time. (40 CFR 63.11519(c)(1)(ii))

- iii. The owner or operator shall maintain a record of the manufacturer's specifications for the filtration control devices to demonstrate compliance with S1.c.iii.1) and S1.c.v.1). (40 CFR 63.11516(a)(2)(i), 40 CFR 63.11516(c)(1), and 40 CFR 63.11519(c)(4))
- iv. *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review. (40 CFR 63.11519(c)(13))
- v. Your records must be maintained according to the requirements below. (40 CFR 63.11519(c)(15))
 - 1) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. (40 CFR 63.11519(c)(15)(i))
 - 2) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record. (40 CFR 63.11519(c)(15)(ii))
 - 3) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record, according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years. (40 CFR 63.11519(c)(15)(iii))

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **PM/PM₁₀**

The owner or operator shall report the consecutive 12-month PM/PM₁₀ emissions for each emission point for each month in the reporting period.

b. **Opacity**

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- ii. The date, time and results of each Method 9 conducted. If there were no Method 9 tests performed during the reporting period, the owner or operator may submit a negative declaration; and description of any corrective action taken.

c. **HAP**

Single and Total HAP

- i. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

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- ii. The owner or operator shall submit annual certification and compliance reports, according to the following requirements:⁹ (40 CFR 63.11519(b)(1))
- 1) The owner or operator shall submit each annual certification and compliance report according no later than January 31 and kept in a readily-accessible location for inspector review. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. If an exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31. (40 CFR 63.11519(b)(2) and 40 CFR 63.11519(b)(2)(iii))
 - 2) The annual certification and compliance report must contain the information specified in §§63.11519(b)(4)(i) through (iii), and (b)(5) through (7) that is applicable to each affected source. (40 CFR 63.11519(b)(4))
 - (a) Company name and address; (40 CFR 63.11519(b)(4)(i))
 - (b) 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 (40 CFR 63.11519(b)(4)(ii))
 - (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. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each (40 CFR 63.11519(b)(4))

⁹ The initial notification of compliance status for 40 CFR 63 Subpart XXXXXX was received July 23, 2011 and revised February 1, 2012. The notification of compliance status was received November 29, 2011.

Emission Unit U3**U3 Cold Solvent Cleaning****U3 Applicable Regulations**

Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 - 4

U3 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control ID	Stack ID
E-13	Two (2) Greymills Cold Solvent parts washers with secondary reservoirs (Previous Permit 284-01)	35 gal each	6.18 (Insignificant Activity)	NA	NA

U3 Controls

There are no control devices for EU U3.

U3 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

VOC

- a. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
 - i. The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
 - ii. The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
 - iii. A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
 - iv. If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
 - v. Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
 - vi. The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- b. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
 - i. Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
 - ii. The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)

- iii. The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
 - iv. Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
 - v. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
 - vi. A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
 - vii. Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- c. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20EC (68EF). (Regulation 6.18, section 4.3.2)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

VOC

- a. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)
 - i. The name and address of the solvent supplier,
 - ii. The date of the purchase,
 - iii. The type of the solvent, and
 - iv. The vapor pressure of the solvent measured in mm Hg at 20EC (68EF).
- b. All records required in Specific Condition S2.a. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

S3. Reporting (Regulation 2.17, section 5.2)

VOC

There are no routine compliance reporting requirements for Regulation 6.18.

Emission Unit U4**U4 Welding****U4 Applicable Regulations**

Regulation	Title	Applicable Sections
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants.	1, 2, and 4.129
5.14	Hazardous Air Pollutants and Source Categories	1 through 5
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, 4 and 5
7.08	Standards of Performance for New Process Operations	1, 2 and 3
40 CFR 63 Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	§§ 63.11514 through 63.11517, 63.11519, 63.11521, 63.11522

U4 Equipment

Emission Point ID	Description Make/Model	Maximum Capacity	Applicable Regulation	Control ID	Stack ID
NA	Fifty-two (52) welding stations	NA	5.14, 6.09, 7.08, 40 CFR 63 Subpart XXXXXX	Uncontrolled except one robot welder is equipped with a small portable dust collector.	NA

U4 Controls

Small portable dust collector for one robot welder.

U4 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM/PM₁₀

- i. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for each welder subject to Regulation 7.08 based on actual operating hours in a calendar day.¹⁰ (7.08, Section 3.1.2)
- ii. The owner or operator shall not allow PM emissions to exceed 2.58 lb/hr for each welder subject to Regulation 6.09 based on actual operating hours in a calendar day. (Regulation 6.09, Section 3.2)¹⁰
- iii. The owner or operator shall not allow the plant-wide month PM/PM₁₀ emissions to equal or exceed 25 tons per consecutive 12-month period.¹¹ (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)

b. Opacity

The owner or operator shall not cause or permit the discharge of emissions equal to or in excess of 20% opacity. (Regulations 6.09, Section 3.1, and 7.08, Section 3.1.1)

c. HAP

Single and Total HAPs

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.2)¹¹
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1 and Regulation 5.00, section 1.13.5.3)¹¹

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- iii. *Standards for welding.* The owner or operator must comply with the requirements in §§63.11516(f)(1) and (2) for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in the following §§63.11516(f)(3) through (8). The requirements in §§63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any

¹⁰ This equipment cannot exceed the standard for PM uncontrolled.

¹¹ The source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

materials containing MFHAP or do not have the potential to emit MFHAP. (40 CFR 63.11516(f))

- 1) Operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. (40 CFR 63.11516(f)(1))
- 2) You must implement one or more of the management practices specified in the following paragraphs to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment. (40 CFR 63.11516(f)(2))
 - (a) 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))
 - (b) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates; (40 CFR 63.11516(f)(2)(ii))
 - (c) 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))
 - (d) 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 (40 CFR 63.11516(f)(2)(iv))
 - (e) Use a welding fume capture and control system, operated according to the manufacturer's specifications. (40 CFR 63.11516(f)(2)(v))
- 3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions, as specified in S2.c.iii., at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(3))
- 4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in the above paragraph, you must 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. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions, in accordance with S2.c.ii., at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(4) and 40 CFR 63.11516(f)(4)(i))
- 5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once

during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with the following paragraphs. (40 CFR 63.11516(f)(5))

- (a) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in S2.c.iv., at the primary vent, stack, exit, or opening from the building containing the welding operations. (40 CFR 63.11516(f)(5)(i))
 - (b) In lieu of the requirement to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity, in accordance with S2.c.v., 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))
- 6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with S1.c.iii.5) for which the average of the six-minute average opacities recorded is 20% or less but greater than zero, you 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 §63.11516(f)(2). (40 CFR 63.11516(f)(6))
- 7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with S1.c.iii.5) for which the average of the six-minute average opacities recorded exceeds 20%, you must comply with the requirements in the following paragraphs. (40 CFR 63.11516(f)(7))
- (a) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in §63.11516(f)(8). If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with §63.11516(f)(8), you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days. (40 CFR 63.11516(f)(7)(ii))
 - (b) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule, as specified in S2.c.v., 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))

- 8) *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))
- (a) The Site-Specific Welding Emissions Management Plan must contain the information in the following paragraphs. (40 CFR 63.11516(f)(8)(i))
 - (1) Company name and address; (40 CFR 63.11516(f)(8)(i)(A))
 - (2) A list and description of all welding operations which currently comprise the welding affected source; (40 CFR 63.11516(f)(8)(i)(B))
 - (3) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence; (40 CFR 63.11516(f)(8)(i)(C))
 - (4) A list and description of all management practices and/or fume control methods currently employed for the welding affected source; (40 CFR 63.11516(f)(8)(i)(D))
 - (5) A description of additional management practices and/or fume control methods to be implemented pursuant to §63.11516(f)(7)(ii), and the projected date of implementation; and (40 CFR 63.11516(f)(8)(i)(E))
 - (6) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries. (40 CFR 63.11516(f)(8)(i)(F))
 - (b) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information as required by §§63.11516(f)(8)(i)(A) - (C), and submitted with the annual certification and compliance report according to the requirements of §63.11519(b)(1). (40 CFR 63.11516(f)(8)(ii))

S2. Monitoring and Recordkeeping (Regulation 2.17, section 5.2)

a. **PM/PM₁₀**

The owner or operator shall monthly calculate and record the 12-consecutive month PM/PM₁₀ emissions for each month.¹²

b. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The

¹² See AP-42 Chapter 12.20 (Table 12.19-1) for emission factors from welding.

opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **HAP**

Single and Total HAPs

- i. The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

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- ii. *Visual determination of fugitive emissions, general.* Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR 60, Appendix A-7. You 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))
- iii. *Visual determination of fugitive emissions, graduated schedule.* Visual determinations of fugitive emissions must be performed in accordance with S2.c.ii. (above) and according to the following schedule. (40 CFR 63.11517(b))
 - 1) *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. (40 CFR 63.11517(b)(1))
 - 2) *Weekly Method 22 Testing.* If there are no visible fugitive emissions detected in 10 consecutive daily tests, you may reduce the Method 22 testing frequency to once every five (5) days of operation (one calendar week). If visible fugitive emissions are detected during these tests, you must resume testing of that operation once per day during each day that the process is in operation. (40 CFR 63.11517(b)(2))

- 3) *Monthly Method 22 Testing.* If there are no visible fugitive emissions detected in four (4) consecutive weekly tests, you may decrease the testing frequency to once every 21 days of operation (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly testing. (40 CFR 63.11517(b)(3))
 - 4) *Quarterly Method 22 Testing.* If there are no visible fugitive emissions detected in three (3) consecutive monthly tests, you may decrease the testing frequency to once every 60 days of operation (three (3) calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly testing. (40 CFR 63.11517(b)(4))
- iv. *Visual determination of emissions opacity for welding Tier 2 or 3, general.* 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 shall be thirty minutes. (40 CFR 63.11517(c))
- v. *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with S2.c.iv. (above) and according to the following schedule. (40 CFR 63.11517(d))
- 1) *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. (40 CFR 63.11517(d)(1))
 - 2) *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 EPA Method 9 tests does not exceed 20 percent for 10 days of operation of the process, you 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, you must resume testing every day of operation of the process. (40 CFR 63.11517(d)(2))
 - 3) *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 EPA Method 9 tests does not exceed 20 percent for four (4) consecutive weekly tests, you 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, you must resume testing every five days of operation of the process. (40 CFR 63.11517(d)(3))
 - 4) *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 EPA Method 9 tests does not exceed 20 percent for three

- (3) consecutive monthly tests, you 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, you must resume testing every 21 days (month) of operation of the process. (40 CFR 63.11517(d)(4))
- 5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests does not exceed 20 percent, you may resume EPA Method 22 testing. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with S2.c.v.3) and S2.c.v.4). (40 CFR 63.11517(d)(5))
- vi. *Recordkeeping.* The owner or operator must collect and keep records of the data and information specified in §§63.11519(c)(1) through (13), according to the requirements in §63.11519(c)(14). (40 CFR 63.11519(c))
- 1) *General compliance and applicability records.* Maintain information specified in the following paragraphs. (40 CFR 63.11519(c)(1))
- (a) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. (40 CFR 63.11519(c)(1)(i))
- (b) Records of the applicability determinations listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time. (40 CFR 63.11519(c)(1)(ii))
- 2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in the following paragraphs for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a). (40 CFR 63.11516(f)(3) and 40 CFR 63.11519(c)(2))
- (a) The date and results of every visual determination of fugitive emissions; (40 CFR 63.11519(c)(2)(i))
- (b) A description of any corrective action taken subsequent to the test; and (40 CFR 63.11519(c)(2)(ii))
- (c) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions. (40 CFR 63.11519(c)(2)(iii))
- 2) *Visual determination of emissions opacity records.* Maintain a record of the information for each affected source which performs visual determination of emissions opacity. (40 CFR 63.11516(f)(5)(iii) and 40 CFR 63.11519(c)(3))
- (a) The date of every visual determination of emissions opacity; and (40 CFR 63.11519(c)(3)(i))

- (b) The average of the six-minute opacities measured by the test; and (40 CFR 63.11519(c)(3)(ii))
 - (c) A description of any corrective action taken subsequent to the test. (40 CFR 63.11519(c)(3)(iii))
- 3) The owner or operator shall maintain a record of the manufacturer's specifications for the filtration control devices. (40 CFR 63.11516(f)(1) and 40 CFR 63.11519(c)(4))
 - 4) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan. You 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. (40 CFR 63.11516(f)(7)(iv) and 40 CFR 63.11519(c)(11))
 - 5) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with S1.c.iii.8), you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review. (40 CFR 63.11516(f)(8)(iii) and 40 CFR 63.11519(c)(12))
 - 6) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review. (40 CFR 63.11519(c)(13))
 - 7) *Welding Rod usage.* If you operate a welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis. (40 CFR 63.11519(c)(14))
 - 8) Your records must be maintained according to the requirements below. (40 CFR 63.11519(c)(15))
 - (a) Your records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. (40 CFR 63.11519(c)(15)(i))
 - (b) You must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record. (40 CFR 63.11519(c)(15)(ii))
 - (c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record. You may keep the records off-site for the remaining 3 years. (40 CFR 63.11519(c)(15)(iii))

S3. Reporting (Regulation 2.17, section 5.2)**a. PM/PM₁₀**

The owner or operator shall report the consecutive 12-month PM/PM₁₀ emissions for each emission point for each month in the reporting period.

b. Opacity

- i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- ii. The date, time and results of each Method 9 conducted. If there were no Method 9 tests performed during the reporting period, the owner or operator may submit a negative declaration; and
- iii. Description of any corrective action taken.

c. HAP*Total and Single HAPs*

- i. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

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- ii. The owner or operator shall prepare and submit the annual certification and compliance report that contains the following information that is applicable to each affected source¹³. (40 CFR 63.11519(b)(4))
 - 1) Company name and address; (40 CFR 63.11519(b)(4)(i))
 - 2) 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 (40 CFR 63.11519(b)(4)(ii))
 - 3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (40 CFR 63.11519(b)(4)(iii))
- iii. *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the following information for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a). (40 CFR 63.11516(f)(4)(ii) and 40 CFR 63.11519(b)(5))

¹³ The initial notification of compliance status for 40 CFR 63 Subpart XXXXXX was received July 23, 2011 and revised February 1, 2012. The notification of compliance status was received November 29, 2011.

- 1) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions; (40 CFR 63.11519(b)(5)(i))
 - 2) A description of the corrective actions taken subsequent to the test; and (40 CFR 63.11519(b)(5)(ii))
 - 3) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions. (40 CFR 63.11519(b)(5)(iii))
- iv. *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the following information for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c). (40 CFR 63.11516(f)(5)(iv), 40 CFR 63.11516(f)(7)(v), and 40 CFR 63.11519(b)(6))
- 1) The date of every visual determination of emissions opacity; (40 CFR 63.11519(b)(6)(i))
 - 2) The average of the six-minute opacities measured by the test; and (40 CFR 63.11519(b)(6)(ii))
 - 3) A description of any corrective action taken subsequent to the test. (40 CFR 63.11519(b)(6)(iii))
- v. *Exceedences of 20 percent opacity for welding affected sources.* The owner or operator must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in §63.11519(b)(1), and must contain the following information. (40 CFR 63.11516(f)(7)(i) and 40 CFR 63.11519(b)(8))
- 1) The date on which the exceedence occurred; and (40 CFR 63.11519(b)(8)(A))
 - 2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity. (40 CFR 63.11519(b)(8)(B))
- vi. *Site-specific Welding Emissions Management Plan reporting.* The owner or operator must submit a copy of the records of daily visual determinations of emissions opacity recorded in accordance with §63.11516(f)(7)(iv) during preparation of the plan, and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), along with your annual certification and compliance report, according to the requirements in §63.11519(b)(1). (40 CFR 63.11516(f)(7)(iv) and 40 CFR 63.11519(b)(9))

Insignificant Activities

Description	Quantity	Basis (Regulation 1.02)
Natural-gas heated hot water spray station	1	Section 1.38.1.1

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.