



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

May 26, 2016

Tim Salak,
Coatings Director
SME Steel
5801 W. Wells Park Road
West Jordan, Utah 84081

RE: Facility ID No. 005-00043, SME Steel, Pocatello
Final Permit Letter

Dear Mr. Salak:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2015.0019 Project 61523 to SME Steel located at Pocatello. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 7, 2015 and supplemental information received November 18, 2015 and February 3, 2016.

This permit is effective immediately and does not release SME Steel from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way, #300, Pocatello, ID 83201, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Dan Pitman at (208) 373-0502 or daniel.pitman@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSNDP
Permit No. P-2015.0019 PROJ 61523
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee SME Steel
Permit Number P-2015.0019
Project ID 61523
Facility ID 005-00043
Facility Location 669 West Quinn Road Building 28
Pocatello, ID 83202

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued May 26, 2016



Dan Pitman, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is the initial permit to construct (PTC) for an existing metal fabrication facility. Prior to this permit action the facility conducted only welding and machining. This permit action is for the addition of an abrasive blasting and painting operations to the existing facility. The applicable requirements of 40 CFR 63 Subpart XXXXXX have been added to this permit for both the existing and new operations.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Abrasive Blasting Painting	3 Sided Enclosure Paint room equipped with ventilation system that includes a filter system and airless paint guns.
3	Welding, Machining and Abrasive Blasting	Comply with 40 CFR 63 Subpart XXXXXX requirements.

2 Abrasive Blasting, Painting and Facility-wide HAP Emissions

2.1 Process Description

The facility will conduct abrasive blasting on objects that exceed 8 feet in any dimension. Abrasive blasting will occur outdoors within a 3 sided enclosure. Painting operations will occur in an enclosure equipped with a ventilation system that has filters to control particulate matter emissions. Painting will be accomplished by using only airless paint guns.

2.2 Control Device Descriptions

Table 2.1 Painting and Abrasive Blasting Description

Emissions Units / Processes	Control Devices
Painting Operations	Enclosed room with a ventilation system equipped with filter(s) that remove 90% or more of PM ₁₀
Abrasive Blasting	None

Emission Limits

2.3 Toxic Air Pollutant (TAP) Limits

Each calendar day emissions of TAPs from abrasive blasting and painting operations, including the use of paints, thinners and solvents, shall not exceed the EL (lb/hr) multiplied by 24 (for TAPs listed in both IDAPA 58.01.01.585 and 586) or the acceptable ambient concentration (mg/m³) (for TAPs listed in IDAPA 58.01.01.585) and the acceptable ambient concentration for carcinogens (µg/m³) (for TAPs listed in IDAPA 58.01.01.586).

2.4 Hazardous air Pollutant (HAP) Limits

Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 10 tons per any consecutive 12-calendar month period.

Emissions of any combination of HAPs from the entire facility shall not equal or exceed 25 tons per any consecutive 12-calendar month period.

2.5 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.6 Abrasive Media Restrictions

Abrasive blasting media usage shall not exceed 105 tons per any consecutive 12-month period. The abrasive blasting media shall not include silica.

2.7 Abrasive Blasting Restrictions

Dry abrasive blasting shall only occur on items that exceed 8 feet in any dimension and shall be conducted in a three sided enclosure.

2.8 Painting Enclosure

Painting operations shall occur in a totally enclosed room that has a ventilation system that controls all PM₁₀ emissions from painting operations with a filter system that is guaranteed by the manufacture to control 90% of PM₁₀ emissions. Floor to ceiling curtains are acceptable as part of the enclosure.

2.9 Paint Usage Limit

The permittee shall not use more than 4,944 gallons of paint in any consecutive 12-month period.

2.10 Paint Content Restrictions

The permittee shall not use paint that contains cadmium, chromium, lead, manganese, or nickel.

2.11 Paint Applicator Restrictions

The permittee shall only use airless spray guns for painting operations within the painting enclosure.

Monitoring and Recordkeeping Requirements

2.12 Material Usage Records

The permittee shall monitor and record daily the usage of all HAP and TAP containing materials used in the welding, abrasive blasting and painting operations that emit air pollution including but not limited to paints, thinners, solvents, and abrasive blasting materials.

Each month the permittee shall monitor and record the tons of abrasive blasting material used during the previous consecutive 12-month period.

Each month the permittee shall monitor and record the gallons of paint used during the previous consecutive 12-month period.

2.13 TAPs Emissions Monitoring Requirements

Using the material usage records, the permittee shall monitor and record the individual TAP (as listed in IDAPA 58.01.01.585 and 586) emissions from abrasive blasting and painting operations in order to demonstrate compliance with the TAPs emissions limits in Permit Condition 2.3. All emissions calculations shall be maintained on-site in accordance with the General Provisions.

If any of the individual daily TAP emissions rates exceeds 24 times the screening emissions level (EL) specified in IDAPA 58.01.01.585 and 586, a modeling analysis shall be conducted to demonstrate compliance with the acceptable ambient concentration (mg/m³) (for TAPs listed in IDAPA 58.01.01.585) or the acceptable ambient concentration for carcinogens (µg/m³) (for TAPs listed in IDAPA 58.01.01.586). Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with the General Provisions.

- 2.14** Using the material usage records, each month the permittee shall monitor and record the individual and total HAP emissions from the entire facility during the most recent consecutive 12-month period in order to demonstrate compliance with the HAP emissions limits in this permit. All emissions calculations shall be maintained on-site in accordance with the General Provisions.
- 2.15** The permittee shall maintain on-site and make available to DEQ representatives upon request a manufacturer's guarantee that the filters in the room ventilation system where spray painting operations occur removes at least 90% of the PM₁₀ emitted from spray painting operations.

Reporting Requirements

- 2.16** Each year the permittee shall submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall document the analyses with sufficient detail, including documentation of all calculations and electronic copies of modeling files, so that DEQ can verify the analysis. The report shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

The report shall be titled: SME Steel – Permit Required Modeling Report.

2.17 Excess Emissions

If a TAP modeling analysis conducted pursuant to this permit shows that emissions of any TAP exceeds the acceptable ambient concentration for any TAP, the permittee shall follow the excess emissions requirements of IDAPA 58.01.01.131 including but not limited to correcting the excess emission condition in accordance with IDAPA 58.01.01.132, and submitting excess emission reports no later than 15 days after the beginning of each such event in accordance with IDAPA 58.01.01.135.

3 National Emission Standards for Nine Metal Fabrication and Finishing Sources – 40 CFR 63 Subpart XXXXXX

3.1 Process Description

The permittee is engaged in abrasive blasting, welding and machining operations that are defined as affected sources in accordance with 40 CFR 63 Subpart XXXXXX. The sole purpose of this section of the permit is to incorporate the requirements of this Subpart. Should there be a conflict between 40 CFR 63 Subpart XXXXXX and the provisions of this section of the permit, 40 CFR 63 Subpart XXXXXX shall govern.

Emission Limits

3.2 Dry Abrasive Blasting Standards

In accordance with 40 CFR 63.1156(a)(3) for dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet in any one dimension, the permittee may implement management practices to minimize emissions of metal fabrication hazardous air pollutants (MFHAPs) as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section.

In accordance with 40 CFR 63.1156(a)(3) dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, the permittee may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. The permittee must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

In accordance with 40 CFR 63.1156(a)(3) (i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.

- (A) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- (B) The permittee must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and
- (C) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and
- (D) 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
- (E) 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

In accordance with 40 CFR 63.11516(a)(3) (ii) through (iv) the permittee must demonstrate that management practices are being implemented by complying with following requirements.

In accordance with 40 CFR 63.11516(a)(3) (ii) the permittee must perform visual determinations of fugitive emissions, as specified in §63.11517(b), “What are my monitoring requirements?”, according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.

(A) 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.

(B) 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.

In accordance with 40 CFR 63.11516(a)(3) (iii) 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 §63.11519(c)(2), “What are my notification, recordkeeping, and reporting requirements?”

In accordance with 40 CFR 63.11516(a)(3) (iv) 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 requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), “Monitoring Requirements.”

(B) 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 §63.11519(b)(5), “Notification, recordkeeping, and reporting requirements.”

3.3 Standards for machining

In accordance with 40 CFR 63.11516(b) the permittee must implement management practices to minimize emissions for each machining operation by taking measures necessary to minimize excess dust in the surrounding area to reduce emissions, as practicable and must operate all equipment associated with machining according to manufacturer's instructions.

3.4 Standards for dry grinding and dry polishing with machines

In accordance with 40 CFR 63.11516(c) if the permittee owns or operates a new or existing dry grinding and dry polishing with machines affected source, the permittee must comply with the requirements of paragraphs (1) and (2) of this condition for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, “What definitions apply to this subpart?”, 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.

(1) 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 the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), “Notification, recordkeeping, and reporting Requirements.”

(2) The permittee must implement management practices to minimize emissions of MFHAP as specified in paragraphs (2)(i) and (ii) of this condition.

(i) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;

(ii) The permittee 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.

3.5 Standards for welding

In accordance with 40 CFR 63.11516(f) the permittee must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, “What definitions apply to this subpart?”, or has the potential to emit MFHAP. If the permittee 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 paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

Standards for welding. In accordance with 40 CFR 63.11516(f)(1) the Permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The Permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4).

In accordance with 40 CFR 63.11516(f)(2) the Permittee must implement one or more of the management practices to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment:

- Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
- Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
- Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
- 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
- Use a welding fume capture and control system, operated according to the manufacturer's specifications.

Tier 1 compliance requirements for welding. In accordance with 40 CFR 63.11516(f)(3) the permittee must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), at the primary vent, stack, exit, or opening from the building containing the welding operations. 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 §63.11519(c)(2).

Requirements upon initial detection of visible emissions from welding. In accordance with 40 CFR 63.11516(f)(4) if visible fugitive emissions are detected during any visual determination required of this section, the permittee must comply with additional requirements as follows.

- Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), at the primary vent, stack, exit, or opening from the building containing the welding operations.
- 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, and submit with the required annual certification and compliance report as required by §63.11519(b)(5).

Tier 2 requirements upon subsequent detection of visible emissions. In accordance with 40 CFR 63.11516(f)(5) if visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), the permittee must comply with the following requirements.

- Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee must conduct a visual determination of emissions opacity, as specified in §63.11517(c), at the primary vent, stack, exit, or opening from the building containing the welding operations.
- In lieu of the requirement to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with §63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- The permittee must keep a record of each visual determination of emissions opacity performed in accordance the requirements of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3).
- The permittee must report the results of all visual determinations of emissions opacity performed in accordance with the requirements of this section, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by §63.11519(b)(6).

Requirements for opacities less than or equal to 20 percent but greater than zero. In accordance with 40 CFR 63.11516(f)(6) for each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded is 20% or less but greater than zero, the permittee must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented to comply with these requirements.

Tier 3 requirements for opacities exceeding 20%. In accordance with 40 CFR 63.11516(f)(7) for each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded exceeds 20%, the permittee must comply with the following requirements.

- The permittee must submit a report of exceedence of 20% opacity, along with the required annual certification and compliance report, as specified in §63.11519(b)(8), and according to the requirements of §63.11519(b)(1).

- Within 30 days of the opacity exceedance, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in the Site-Specific Welding Emissions Management Plan requirements. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this requirement, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
- During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with the requirements of this permit, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9).
- The permittee must include these records in the required annual certification and compliance report, according to the requirements of §63.11519(b)(1).

Site-Specific Welding Emissions Management Plan. In accordance with 40 CFR 63.11516(f)(8) the Site-Specific Welding Emissions Management Plan must comply with the following requirements.

- Company name and address;
- A list and description of all welding operations which currently comprise this facility;
- 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 this facility;
- A description of additional management practices and/or fume control methods to be implemented 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.

The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information and submitted with the required annual certification and compliance report, according to the requirements of §63.11519(b)(1).

The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12).

3.6 Monitoring requirements general

In accordance with 40 CFR 63.11517(a), 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.

Visual determinations of fugitive emissions must be performed in accordance with the following requirements:

- *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.
- *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation.
- *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee must resume weekly EPA Method 22 testing.
- *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests, the permittee may decrease the frequency of EPA 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 EPA Method 22 testing.

3.7 Monitoring for welding operations

Visual determination of emissions opacity for welding Tier 2 or 3, general. In accordance with 40 CFR 63.11517(c) and (d), 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 facility is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule. The permittee must perform visual determination of emissions opacity in accordance with the following requirements.

- *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.
- *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% for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20% is detected during any of these tests, the permittee must resume testing every day of operation of the process.
- *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 performed in accordance with paragraph (d)(2) of this section does not exceed 20% for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20% is detected during any monthly test, the permittee must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

- *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% for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20% is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process.
- *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 performed does not exceed 20%, the permittee may resume EPA Method 22 testing. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests.

3.8 Record Keeping - General

General compliance and applicability records. In accordance with 40 CFR 63.11549(c)(1) the permittee must collect and keep records of the data and information specified as follows.

- Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
- Records of the applicability determinations listing equipment included at the facility, 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.

Visual determination of fugitive emissions records. In accordance with 40 CFR 63.11549(c)(2) the permittee shall maintain a record of the information specified below for each required visual determination of fugitive emissions in accordance with §63.11517(a).

- The date and results of every visual determination of fugitive emissions;
- A description of any corrective action taken subsequent to the test; and
- The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

Visual determination of emissions opacity records. In accordance with 40 CFR 63.11549(c)(3) The permittee shall maintain a record of the information specified below for each required visual determination of emissions opacity in accordance with §63.11517(c).

- The date of every visual determination of emissions opacity; and
- The average of the six-minute opacities measured by the test; and
- A description of any corrective action taken subsequent to the test.

In accordance with 40 CFR 63.11549(c)(4) the permittee shall maintain a record of the manufacturer's specifications for the control devices used to comply with the requirements of this subpart §63.11516.

In accordance with 40 CFR 63.11549(c)(15) the facility general operations records must be maintained according to the following requirements.

- The 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.
- As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, corrective action, report, or record.

- The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining three years.

3.9 Record Keeping – Welding

Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan. In accordance with 40 CFR 63.11519(c)(11) 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 §63.11516(f)(7)(iii).

Site-Specific Welding Emissions Management Plan. In accordance with 40 CFR 63.11519(c)(12) if the facility has been required to prepare a plan in accordance with §63.11516(f)(7)(iii), the permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in the facility records and it must be readily available for inspector review.

Manufacturer's instructions. In accordance with 40 CFR 63.11519(c)(13) if the facility complies with this subpart by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review.

Welding Rod usage. In accordance with 40 CFR 63.11519(c)(14) the facility 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), the permittee must maintain records demonstrating the facility's welding rod usage on a rolling 12-month basis.

In accordance with 40 CFR 63.11549(c)(15) the facility welding operations records must be maintained according to the following requirements.

- The facility 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.
- As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- The permittee 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). The permittee may keep the records off-site for the remaining 3 years.

3.10 General Reporting Requirements

Annual certification and compliance reports. In accordance with 40 CFR 63.11519(b) the permittee must prepare and submit annual certification and compliance reports for each affected source according to the following requirements. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA.

Dates. In accordance with 40 CFR 63.11519(b)(2) unless the Administrator (EPA) has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," the permittee must prepare and submit each annual certification and compliance report according to the dates specified as follows. 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.

- The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

- Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
- Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. 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.

General requirements. In accordance with 40 CFR 63.11519(b)(4) the annual certification and compliance report must contain the information specified as follows, and the information specified in the following requirements for fugitive emissions requirements.

- Company name and address;
- 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
- 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.

Visual determination of fugitive emissions requirements. In accordance with 40 CFR 63.11519(b)(5) the annual certification and compliance report must contain the information specified for each facility which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

- The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
- A description of the corrective actions taken subsequent to the test; and
- The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

Visual determination of emissions opacity requirements. In accordance with 40 CFR 63.11519(b)(6) the annual certification and compliance report must contain the information specified for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

- The date of every visual determination of emissions opacity;
- The average of the six-minute opacities measured by the test; and
- A description of any corrective action taken subsequent to the test.

Exceedences of 20 percent opacity for welding affected sources. In accordance with 40 CFR 63.11519(b)(8) as required by §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you 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 paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.

- The date on which the exceedence occurred; and

- The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

3.11 Welding Reporting Requirements

Site-specific Welding Emissions Management Plan reporting. In accordance with 40 CFR 63.11519(b)(9) the permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with §63.11516(f)(7)(iv), “Tier 3 requirements for opacities exceeding 20 percent,” and a copy of the required Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), “Site-specific Welding Emission Management Plan,” along with the required annual certification and compliance report.

3.12 What General Provisions apply to this subpart?

The following General Provisions apply to this facility:

Table 2 to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)-(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	State authority and delegations. (DEQ is not delegated Subpart XXXXXX)
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.
63.16	Performance track provisions

¹§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain title V operating permits.

3.13 Reporting Requirement

In accordance with 40 CFR 63.9, any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Sources, 40 CFR Part 63, Subpart XXXXXX shall be submitted to the following addresses:

EPA Region 10
 Air Operating Permits, OAQ-107
 1200 Sixth Ave.
 Seattle, WA 98101

And

Air Quality Permit Compliance
 Pocatello Regional Office
 Department of Environmental Quality
 444 Hospital Way, #300
 Pocatello, ID 83XXX
 Phone: (208) 236-6160
 Fax: (208) 236-6168

DEQ is not delegated 40 CFR 63 Subpart XXXXXX.

3.14 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Sources, 40 CFR Part 63, Subpart XXXXXX

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

4 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

- 4.6 The permittee shall furnish DEQ written notifications as follows:

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

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 4.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 4.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 4.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]