

RECEIVED

JUL 01 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

Frazier Industrial Company
P.O. Box 808
4537 Lamar Highway
Lamar, SC 29069



June 30, 2011

Mr. Bill Rogers
Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 North Hilton
Boise, Idaho 83706-1255

**Re: Request for Pre-Permit Construction Approval Application
Frazier Industrial Company**

Dear Mr. Rogers:

Enclosed is a pre-permit construction approval application addressing Frazier Industrial Company's (Frazier) proposal to construct a new facility in Idaho Falls, Idaho. Frazier currently operates a facility in Pocatello, Idaho and the new facility will replace the existing facility. Equipment from the existing facility will be transferred to the new facility. Frazier is requesting DEQ process this application in accordance with the 15-day pre-permit construction approval process contained in IDAPA 58.01.01.213. As required in IDAPA 58.01.01.213.01a., the permit to construct application is being submitted concurrently with this pre-permit construction request.

The enclosed pre-permit construction approval application has been prepared in accordance with DEQ's December 2010 guidance document "Pre-permit Construction Approval Guidance Document." On May 16, 2011 Frazier and JBR Environmental Consultants, Inc. held a meeting with DEQ to discuss that a request for pre-permit construction approval would be forthcoming. Also, in accordance with the requirements for a 15-day pre-permit construction approval, Frazier has advertised in the Post Register on June 28, 2011 an invitation to attend a public information meeting to be held at the Hilton Garden Inn in Idaho Falls, Idaho on July 8, 2011 at 9:30 am.

This project meets the eligibility requirements for pre-permit construction approval because the proposed facility is a minor source and does not plan to utilize emission offsets or netting, and the emissions from the facility are unlikely to impact Class I air quality related values. This satisfies the requirement that a certified proof of pre-permit construction eligibility must be submitted with the pre-permit construction approval application in accordance with IDAPA 58.01.01.213.01.

This submittal includes the PTC application, a modeling section that demonstrates compliance with all applicable air quality rules, detailed emission calculations, and a copy of the newspaper announcement for the public information meeting. Additionally, this submittal contains an

electronic copy of the modeling files that support this application and the \$1,000 PTC application fee.

In accordance with IDAPA 58.01.01.213.01.d, I hereby certify that Frazier will comply with any restrictions it has imposed on potential to emit such that emissions will be below major source levels, including emission limitations, operating limitations, and monitoring and reporting requirements.

Pursuant to IDAPA 58.01.01.123, I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Please feel free to myself at 843.326.1477 or Melissa Armer of JBR Environmental Consultants at 208.853.0883 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Peake". The signature is cursive and somewhat stylized.

Richard Peake
Industrial Engineer, Frazier Industrial Company

Enclosures

Cc: JBR Environmental Consultants, Inc.



15- Day Pre-Permit Construction Approval Application Completeness Checklist

This checklist is designed to aid the applicant in submitting a complete pre-permit construction approval application. This checklist should be completed and submitted with the pre-permit construction approval application.

I. Actions Needed Before Submitting Application

- Refer to the Rule. Read the Pre-Permit Construction requirements contained in IDAPA 58.01.01.213, Rules for the Control of Air Pollution in Idaho.
- Refer to DEQ's Pre-Permit Construction Approval Guidance Document. DEQ has developed a guidance document to aid applicants in submitting a complete pre-permit construction approval application. The guidance document is located on DEQ's website (go to http://www.deq.idaho.gov/air/permits_forms/permitting/ptc_prepermit_guidance.pdf)
- Consult with DEQ Representatives. Schedule a pre-application meeting with DEQ to discuss application requirements before submitting the pre-permit construction approval application. Schedule the meeting by contacting the DEQ Air Permit Hotline at **877-5PERMIT**. The meeting can be in person or on the phone. Refer to IDAPA 58.01.01.213.01b.
- Schedule Informational Meeting. Schedule an informational meeting before submitting the pre-permit construction approval application for the purposes of satisfying IDAPA 58.01.01.213.02.a. The purpose for the informational meeting is to provide information about the proposed project to the general public. Refer to IDAPA 58.01.01.213.01.c.
- Submit Ambient Air Quality Modeling Protocol. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the pre-permit construction approval application is submitted. Contact DEQ's Air Quality Hotline at **877-5PERMIT** for information about the protocol.
- Written DEQ Approved Protocol. Written DEQ approval of the modeling protocol must be received before the pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.213.01.c.

II. Application Content

Application content should be prepared using the checklist below. The checklist is based on the requirements contained in IDAPA 58.01.01.213 and DEQ's Pre-Permit Construction Approval Guidance Document.

- Pre-Permit Construction Eligibility and Proof of Eligibility. Pre-permit construction approval is not available for any new Prevention of Significant Deterioration (PSD) major source, any proposed PSD major modification, or any proposed major NSR project in a non-attainment area. Emissions netting and emissions offsets are not allowed to be used. A certified proof of pre-permit construction eligibility must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.
- Request to Construct Before Obtaining a Permit to Construct. A letter requesting the ability to construct before obtaining the required permit to construct must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.c.
- Apply for a Permit to Construct. Submit a Permit to Construct application using forms available on DEQ's website at <http://www.deq.idaho.gov>. Refer to IDAPA 58.01.01.213.01.a.



-
- Permit to Construct Application Fee. The permit to construct application fee of \$1000 must be submitted at the time the original pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.224. If the pre-permit construction approval is denied and a new application is submitted, a new \$1,000 application fee will be required to be submitted. The application fee is not transferable or refundable. The application fee can be paid by check, credit card or Electronic Funds Transfer (EFT). If you choose to pay by credit card or EFT, please refer to the following Access Idaho link:
<https://www.accessidaho.org/secure/deq/payport/item.html?id=511>
If you choose to pay by check, enclose the check with your pre-permit construction approval application.
 - Notice of Informational Meeting. Within 10 days after the submittal of the pre-permit construction approval application, an informational meeting must be held in at least one location in the region where the stationary source will be located. The information meeting must be made known by notice published at least 10 days before the informational meeting in a newspaper of general circulation in the county in which the stationary source will be located. A copy of this notice, as published, must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.02.a. Additional information regarding the informational meeting is included in DEQ's Pre-Permit Construction Approval Guidance Document. (go to http://www.deq.idaho.gov/air/permits_forms/permitting/ptc_prepermit_guidance.pdf)
 - Process Description(s). The process or processes for which pre-permit construction approval is requested must be described in sufficient detail and clarity such that a member of the general public not familiar with air quality can clearly understand the proposed project. A process flow diagram is required for each process for which pre-permit construction approval is requested. Refer to IDAPA 58.01.01.213.01.c.
 - Equipment List. All equipment that will be used for which pre-permit construction approval is requested must be described in detail. Such description includes, but is not limited to, manufacturer, model number or other descriptor, serial number, maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flowrate, stack gas temperature, etc. All equipment that will be used for which pre-permit construction approval is requested must be clearly labeled on the process flow diagram. Refer to IDAPA 58.01.01.213.01.c.
 - Scaled Plot Plan. It is required a scaled plot plan be included in the permit to construct application and it must clearly label the location of each proposed process and the equipment that will be used in the process.
 - Proposed Emissions Limits and Modeled Ambient Concentration for All Regulated Air Pollutants. All proposed emission limits and modeled ambient concentrations for all regulated air pollutants must demonstrate compliance with all applicable air quality rules and regulations. Regulated air pollutants include criteria air pollutants (PM₁₀, SO_x, NO₂, O₃, CO, lead), toxic air pollutants listed pursuant to IDAPA 58.01.01.585 and 586, and hazardous air pollutants listed pursuant to Section 112 of the 1990 Clean Air Act Amendments (go to <http://www.epa.gov/ttn/atw/188polls.html>). Describe in detail how the proposed emissions limits and modeled ambient concentrations demonstrate compliance with each applicable air quality rule and regulation. It is requested that emissions calculations, assumptions, and documentation be submitted with sufficient detail so DEQ can verify the validity of the emissions estimates. Refer to IDAPA 58.01.01.213.01.c.
 - Restrictions on a Source's Potential to Emit. Any proposed restriction on a source's potential to emit such that permitted emissions will be either below major source levels or below a significant increase must be described in detail in the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.d.
 - List all Applicable Air Quality Rules and Regulations. All applicable rules and regulations must be cited by the rule or regulation section/subpart that applies for each emissions unit. Refer to IDAPA 58.01.01.213.01.c.
 - Certification of Pre-Permit Construction Approval Application. The pre-permit construction approval application must be signed by the Responsible Official and must contain a certification signed by the Responsible Official. The certification must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Refer to IDAPA 58.01.01.213.01.d and IDAPA 58.01.01.123.



Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline - 1-877-5PERMIT

AQ-CH-P004

-
- Submit the Pre-Construction Approval Application. Submit the pre-permit construction approval application and application fee to the following address:

Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 North Hilton
Boise, ID 83706-1255

Frazier Industrial Company

15-Day Pre-Permit Construction Approval and Permit- to-Construct Application

Frazier Industrial Company- Idaho Falls Facility

Prepared for:

Frazier Industrial Company
P.O. Box 808
4537 Lamar Highway
Lamar, SC 29069

Prepared by:

JBR Environmental Consultants, Inc.
7669 West Riverside Drive, Suite 101
Boise, ID 83714

June 2011



creating solutions for today's environment



www.jbrenv.com

TABLE OF CONTENTS

Section	Page
1.0 INTRODUCTION	1
2.0 PROCESS DESCRIPTION.....	1
2.1 Equipment List.....	3
3.0 REGULATORY APPLICABILITY	4
3.1 State Regulatory Applicability.....	4
3.1.1 Certification of Documents.....	5
3.1.2 Excess Emissions.....	5
3.1.3 Demonstration of Preconstruction Compliance with Toxic Standards	6
3.1.4 Ambient Air Quality Standards for Specific Air Pollutants	6
3.1.5 Toxic Air Pollutants.....	6
3.1.6 New Source Performance Standards	6
3.1.7 National Emission Standards for Hazardous Air Pollutants (NESHAPs).....	6
3.1.8 Open Burning	7
3.1.9 Visible Emissions	7
3.1.10 Rules for Control of Fugitive Dust.....	7
3.1.11 Odors.....	7
3.2 Federal Regulatory Applicability.....	7
3.2.1 National Ambient Air Quality Standards (NAAQS).....	8
3.2.2 Title V (Part 70) Operating Permit.....	8
3.2.3 National Emission Standards for Hazardous Air Pollutants (NESHAPs).....	9
3.2.4 New Source Review (NSR) Requirements	9
3.2.5 New Source Performance Standards (NSPS).....	9
3.2.6 Acid Rain Requirements.....	9
3.2.7 Risk Management Programs for Chemical Accidental Release Prevention.....	9
4.0 EMISSION SUMMARY.....	10
5.0 PROPOSED PERMIT LIMITS.....	11



APPENDIXES

Appendix A	Facility Location Map and Plot Plan
Appendix B	Public Informational Meeting
Appendix C	DEQ PTC Application Forms and Checklists
Appendix D	Process Flow Diagram
Appendix E	Emission Inventory
Appendix F	Manufacturer Information and MSDS
Appendix G	Ambient Impact Assessment

1.0 INTRODUCTION

Frazier Industrial Company (Frazier) manufactures structural steel storage systems. Frazier currently operates a facility in Pocatello and plans to build a new facility in Idaho Falls. The new Idaho Falls facility will replace the Pocatello facility and equipment from the Pocatello facility will be transferred to the Idaho Falls facility.

A site location map and plot plan are included in Appendix A. The purpose of this document is to present all necessary and applicable information regarding the facility in support of a 15-Day Pre-Permit Construction Approval Application and Permit to Construct (PTC) Application for the facility. Appendix B contains a copy of the public notice of the informational meeting to be held in accordance with IDAPA 58.01.01.213.02. All applicable required DEQ PTC forms and checklists are included in Appendix C.

2.0 PROCESS DESCRIPTION

Frazier manufactures structural steel storage systems. Steel is delivered to the facility and is then cut and welded into product components. The type of welding conducted at the facility is gas metal arc welding or metal inert gas (MIG) welding. The welded steel components are then bundled and prepared to be coated with paint.

The steel components are coated using a dip tank paint system consisting of three large rectangular steel tanks used to contain the paint. Tank 1 (3,636 gal) and Tank 2 (1,793 gal) typically contain orange paint and Tank 3 (8,311 gal) contains blue paint. Frazier also has the capability of coating its steel components with yellow paint. The yellow paint is used less frequently than the orange and blue paint and based on customer demand. The yellow paint is placed in Tank 2 after the orange paint has been fully cleaned out. Each dip tank system is internally fabricated. The dip tank system is capable of keeping the paint mixed, filtered and within a predetermined temperature. Figure 1 below shows the dip tank configuration.

Aromatic 100 solvent is stored in 55 gallon drums. The solvent is added to the dip tanks to obtain the desired paint viscosity. The solvent is also occasionally used to clean paint from rollers, scrapers and other tools used in the painting operation. The solvent that is used for cleaning is recycled back into the process by being mixed in the dip tanks when needed. The orange, blue, and yellow paint is also stored in metal mobile totes prior to being placed in the dip tanks. Each storage tote is approximately 330 gallons and the lid is closed when not in use. The dip tank is open when steel is being dipped and is closed when not in use. The facility utilizes a wall exhaust fan to provide building ventilation. The exhaust fan does not control emissions from the building.

Steel components are typically dipped and kept in the dip tank for a minimum of two minutes. Once the steel components are coated they are hoisted out of the tank and allowed to drain for approximately 25 minutes. Next, a nap paint roller is used to smooth out any excess paint and coat unpainted surfaces. The painted steel components are then sent to the storage area where

the finished product is stored until it is shipped to the customer.

Frazier's facility normal operating schedule is:

16 hours per day

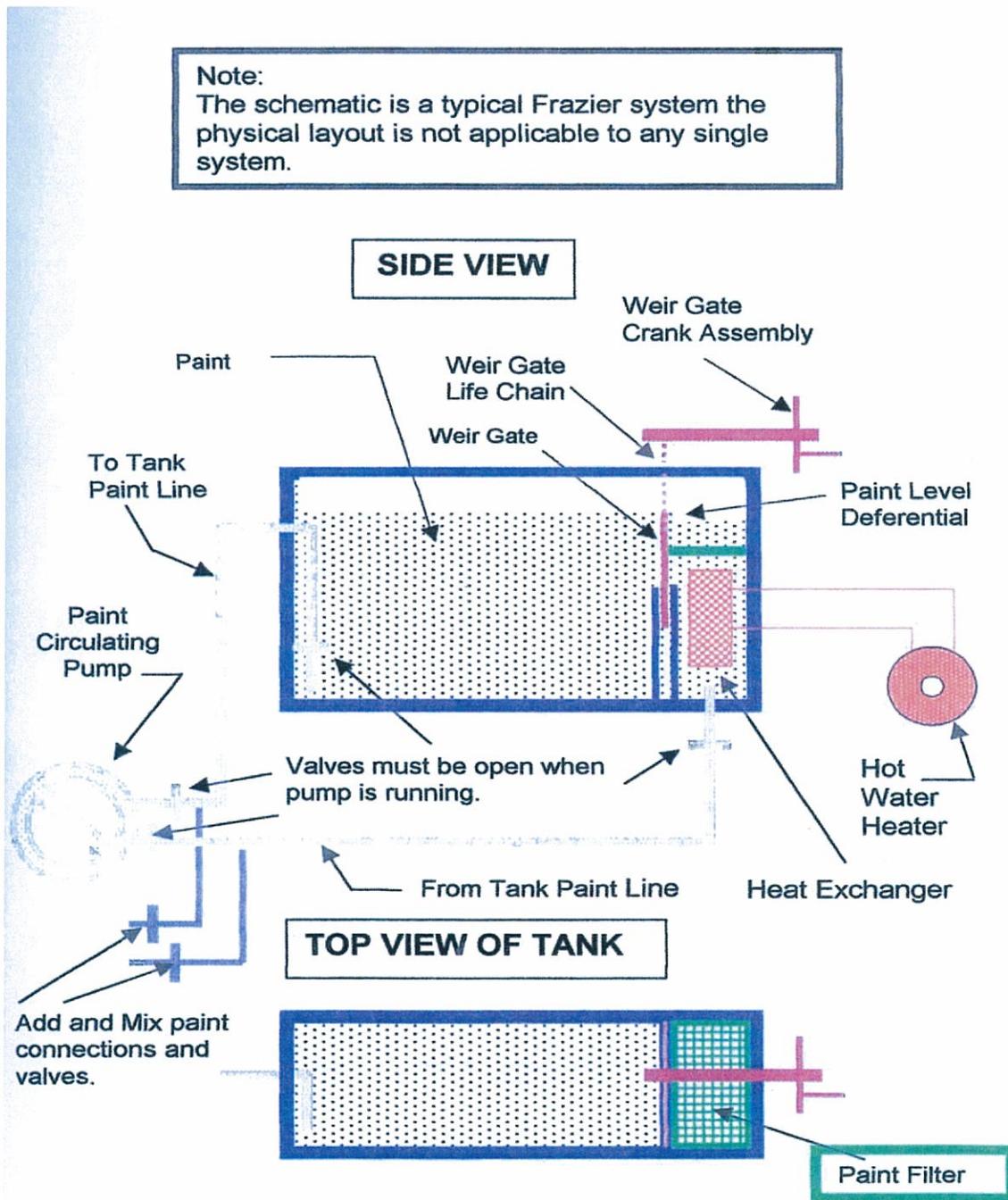
7 days per week

50 weeks per year

5,600 hours per year

Due to the nature of the dip tank operation, they are not able to operate continuously. Proposed usage limits for the dip tank operations are outlined in Section 5.0.

Figure 1- Dip Tank Configuration



2.1 Equipment List

Included in Appendix A is a site location map and plot plan which identifies all equipment that is requested to be included in the PTC permit. Included in Appendix C are the PTC application forms which describe in detail all equipment that is requested to be included in the PTC permit. Appendix D includes a process flow diagram.

3.0 REGULATORY APPLICABILITY

A review of state and local air quality regulations has been conducted and each regulation is described in the following sections. Included in Appendix C is the completed federal regulatory applicability PTC form.

A review of applicable State and Federal Rules for each emissions unit is provided in Sections 3.1 and 3.2 below.

3.1 State Regulatory Applicability

A review of applicable requirements of the Rules for the Control of Air Pollution in Idaho is provided in Table 3-1. Each regulation is described in the sections following the table.

Table 3-1 State Regulatory Applicability Summary

Section	Description	Regulatory Citation	Applicable?
3.1.1	Certification of Documents	IDAPA 58.01.01.123	Yes
3.1.2	Excess Emissions	IDAPA 58.01.01.130-136	Yes
3.1.3	Demonstration of Preconstruction Compliance with Toxic Standards	IDAPA 58.01.01.210	Yes
3.1.4	Ambient Air Quality Standards for Specific Air Pollutants	IDAPA 58.01.01.577	Yes
3.1.5	Toxic Air Pollutants	IDAPA 58.01.01.585 and 586	Yes
3.1.6	New Source Performance Standards	IDAPA 58.01.01.590	Yes
3.1.7	National Emissions Standards for Hazardous Air Pollutants	IDAPA 58.01.01.591	Yes
3.1.8	Open Burning	IDAPA 58.01.01.600-616	Yes
3.1.9	Visible Emissions	IDAPA 58.01.01.625	Yes
3.1.10	Rules for Control of Fugitive Dust	IDAPA 58.01.01.650	Yes
3.1.11	Fuel Burning Equipment – Particulate Matter	IDAPA 58.01.01.675-681	NA
3.1.12	Particulate Matter – Process Weight Limitations	IDAPA 58.01.01.701	NA
3.1.13	Odors	IDAPA 58.01.01.775-776	Yes

3.1.1 Certification of Documents

IDAPA 58.01.01.123 requires all documents including application forms for permits to construct, records, and monitoring reports submitted to the Department shall contain a certification by a responsible official. Frazier will comply with this requirement and the appropriate certifications by a responsible official are being submitted with this application.

3.1.2 Excess Emissions

IDAPA 58.01.01.130-136 establishes procedures and requirements to be implemented in all excess emissions events. Frazier will comply with the procedures and requirements outlined in Section 131-136 and submit the necessary information and reports to DEQ related to excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and

breakdowns.

3.1.3 Demonstration of Preconstruction Compliance with Toxic Standards

IDAPA 58.01.01.210 establishes requirements for preconstruction compliance with toxic standards. Frazier will comply with this rule by identifying and calculating the toxic pollutant emission rates from all applicable emissions units at the facility.

As described in Section 4.0 Emission Summary, Frazier calculated the increase in Toxic Air Pollutant (TAP) emission rates from all emissions units (paint tanks and welding) and compared them to the screening levels. Frazier then modeled the ambient concentrations for those toxics which exceeded their respective emission screening levels. A complete modeling report (Ambient Impact Assessment) is included in Appendix G which documents how Frazier demonstrates preconstruction compliance with toxic air quality preconstruction standards.

3.1.4 Ambient Air Quality Standards for Specific Air Pollutants

IDAPA 58.01.01.577 establishes ambient air quality standards for specific air pollutants including PM-10, Sulfur Dioxide, Ozone, Nitrogen Oxide, Carbon Monoxide, Fluorides and Lead. Frazier has demonstrated compliance with these standards and documentation of compliance is included in Appendix G.

3.1.5 Toxic Air Pollutants

IDAPA 58.01.01.585 and 586 establishes requirements for compliance with toxic air pollutants. Frazier demonstrates compliance with the standards in the modeling report included in Appendix G. The TAP Preconstruction Compliance Application Completeness Checklist is included in Attachment C and TAP emissions are shown in Section 4.0 below.

3.1.6 New Source Performance Standards

New Source Performance Standards (NSPS) in 40 CFR Part 60 are applicable to new, modified, or reconstructed stationary sources that meet or exceed specified applicability thresholds. Frazier does not meet the applicability criteria for any NSPS.

3.1.7 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Two sets of National Emissions Standards for Hazardous Air Pollutants (NESHAPs) may potentially apply to the Frazier facility. The first NESHAP regulations were developed under the auspices of the original CAA. These standards are codified in 40 CFR Part 61, and address a limited number of pollutants and industries. 40 CFR Part 61 regulations do not apply to this planned facility.

Newer regulations are codified in 40 CFR Part 63 under the authority of the 1990 Clean Air Act Amendments (CAAA). These standards regulate HAP emissions from specific source categories. Part 63 regulations are frequently called Maximum Achievable Control Technology (MACT) standards. Major HAP sources have the PTE 10 tpy or more of any single HAP or 25 tpy or more of all combined HAP emissions.

Frazier is not a major HAP source and not subject to MACT standards including 40 CFR Part 63, Subpart M MMM Surface Coating of Miscellaneous Metal Parts and Products.

40 CFR Part 63 Subpart XXXXXX establishes requirements for area sources primarily engaged in operations in one of the nine source categories. Frazier Industrial's operation fall under the source category of Fabricated Metal Products. Included in Appendix C is a complete regulatory analysis

3.1.8 Open Burning

IDAPA 58.01.01.600 and 616 establishes requirements for open burning. Frazier does not expect to conduct open burning at the facility however will comply with the requirements under Section 600-616 if any allowable burning is to be conducted at the facility.

3.1.9 Visible Emissions

IDAPA 58.01.01.625 restricts discharge of air pollutants into the atmosphere which is greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Frazier will comply with this rule by conducting inspections of potential sources of visible emissions, during daylight hours and under normal operating conditions.

The inspection will also be completed in accordance with the requirements of 40 CFR 63 Subpart XXXXXX as discussed in Section 3.1.7. Frazier will keep records onsite documenting the visible emission inspections and any Method 9 test conducted.

3.1.10 Rules for Control of Fugitive Dust

IDAPA 58.01.01.650 requires that all reasonable precautions be taken to prevent the generation of fugitive dust. Frazier will comply with fugitive particulate matter regulations, through the use of reduced speed limits in loading and unloading areas.

3.1.11 Odors

IDAPA 58.01.01.775-776 requires no emissions of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution. Frazier will comply with this requirement by keeping records of any odor complaints received and will take appropriate action for each complaint which has merit.

3.2 Federal Regulatory Applicability

A review of applicable Federal Rules is provided in Table 3-2. Included in Appendix C is the completed federal regulatory applicability PTC form.

Table 3-2 Federal Regulatory Applicability Summary

Section	Description	Regulatory Citation	Applicable?
3.2.1	National Ambient Air Quality Standards (NAAQS)- (dispersion modeling)	40 CFR Part 50	Yes
3.2.2	Title V Operating Permit	40 CFR Part 70	No
3.2.3	Air Pollutants (NESHAPs)	40 CFR Parts 61, 63	Yes
3.2.4	New Source Review (NSR)	40 CFR Part 52	No
3.2.5	New Source Performance Standards (NSPS)	40 CFR Part 60	No
3.2.6	Acid Rain Requirements	40 CFR Parts 72–78	No
3.2.7	Risk Management Programs For Chemical Accidental Release Prevention	40 CFR Part 68	No

3.2.1 National Ambient Air Quality Standards (NAAQS)

Primary National Ambient Air Quality Standards (NAAQS) are identified in 40 CFR Part 50 and define levels of air quality, which the United States Environmental Protection Agency (USEPA) deems necessary to protect the public health. Secondary NAAQS define levels of air quality, which the USEPA judges necessary to protect public welfare from any known, or anticipated adverse effects of a pollutant. Examples of public welfare include protecting wildlife, buildings, national monuments, vegetation, visibility, and property values from degradation due to excessive emissions of criteria pollutants.

Specific standards for the following pollutants have been promulgated by USEPA: PM10, SO2, NOx, CO, ozone, and lead. The Frazier facility emits PM10, and VOCs, a precursor to ozone. The facility is a minor source with respect to PSD and Title V as it will not exceed any major source thresholds.

3.2.2 Title V (Part 70) Operating Permit

Title V of the Clean Air Act (CAA) created the federal operating permit program. These permitting requirements are codified in 40 CFR Part 70. These permits are required for major sources with a PTE (considering federally enforceable limitations) greater than 100 tpy for any criteria pollutant, 25 tpy for all hazardous air pollutants (HAPs) in aggregate, or 10 tpy of any single HAP. Frazier is a minor source because the potential to emit of any criteria pollutant is

less than 100 tons per year, the potential to emit of all HAPs in aggregate is less than 25 tpy, and the potential to emit of any single HAP is less than 10 tpy.

3.2.3 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

National Emission Standards for Hazardous Air Pollutants are discussed in Section 3.1.7 above.

3.2.4 New Source Review (NSR) Requirements

Bonneville County is designated as an attainment area for all criteria pollutants. Therefore, the prevention of significant deterioration (PSD) regulations codified in 40 CFR Part 52 could potentially apply to the proposed facility. The PSD rule applies to: (1) a new major source that has the potential to emit 100 tons per year or more for any criteria pollutant for a facility that is one of the 28 industrial source categories listed in 40 CFR § 52.21(b)(1)(i)(a); or (2) a new major source that has the potential to emit 250 tons per year or more of a regulated pollutant if the facility is not on the list of industrial source categories; or (3) a modification to an existing major source that results in a net emission increase greater than a PSD significant emission rate as specified in 40 CFR § 52.21 (b)(23)(i); or (4) a modification to an existing minor source that is major in itself. The Frazier facility does not fall under one of the 28 industrial source categories, nor will the PTE exceed 250 tpy for any regulated pollutant. Therefore, Frazier is not subject to PSD regulations.

3.2.5 New Source Performance Standards (NSPS)

New Source Performance Standards are discussed in Section 3.1.6 above.

3.2.6 Acid Rain Requirements

The acid rain requirements codified in 40 CFR Parts 72-78 apply only to utilities and other facilities that combust fossil fuel and generate electricity for wholesale or retail sale. The proposed facility will not produce electrical power for sale. Therefore, the facility is not subject to the acid rain provisions and will not require an acid rain permit.

3.2.7 Risk Management Programs for Chemical Accidental Release Prevention

The facility is not subject to the Chemical Accidental Release Prevention Program and will not be required to develop a Risk Management Plan (RMP). Facilities that produce, process, store, or use any regulated toxic or flammable substance in excess of the thresholds listed in 40 CFR Part 68 must develop a RMP. The facility does not store any regulated toxic or flammable substances in excess of the applicable thresholds. A RMP is not necessary for this facility.

4.0 EMISSION SUMMARY

A summary of the potential emissions for the facility is presented in Table 4-1. Emission calculations have been completed for: PM10, VOCs and both individual and combined hazardous air pollutants. Detailed emission calculations are included in Appendix E. Permit application forms are included as Appendix C. The facility potential to emit is based on the proposed permit limits outlined in Section 5.0. The facility also has the potential to emit toxic air pollutants (TAPs) which are outlined in Table 4-2. Documentation of compliance with NAAQS standards, Acceptable Ambient Concentrations (AACs) for IDAPA 58.01.01.585 non-carcinogen TAPs is documented in the air quality modeling report included in Appendix G.

Table 4-1. Frazier Industrial Company Criteria PTE

	PM₁₀ (tpy)	VOC (tpy)	Individual HAP (tpy)	Combined HAP (tpy)
Emissions	0.35	98.30	2.49	3.23

Table 4-2. Frazier Industrial Company TAP screening

Pollutant	Total (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
n-Butyl Alcohol	2	10	No
Xylene	1	29	No
Ethyl Benzene	0.2	29	No
Stoddard	1	35	No
Cumene	0.1	16.3	No
Trimethyl Benzene	12.9	8.2	Yes
Iron Oxide	0.157	0.333	No
Manganese	0.029	0.067	No
Nickel	1.9E-05	2.7E-05	No
Chromium	5.6E-05	0.033	No
Fluorine	1.9E-05	0.133	No

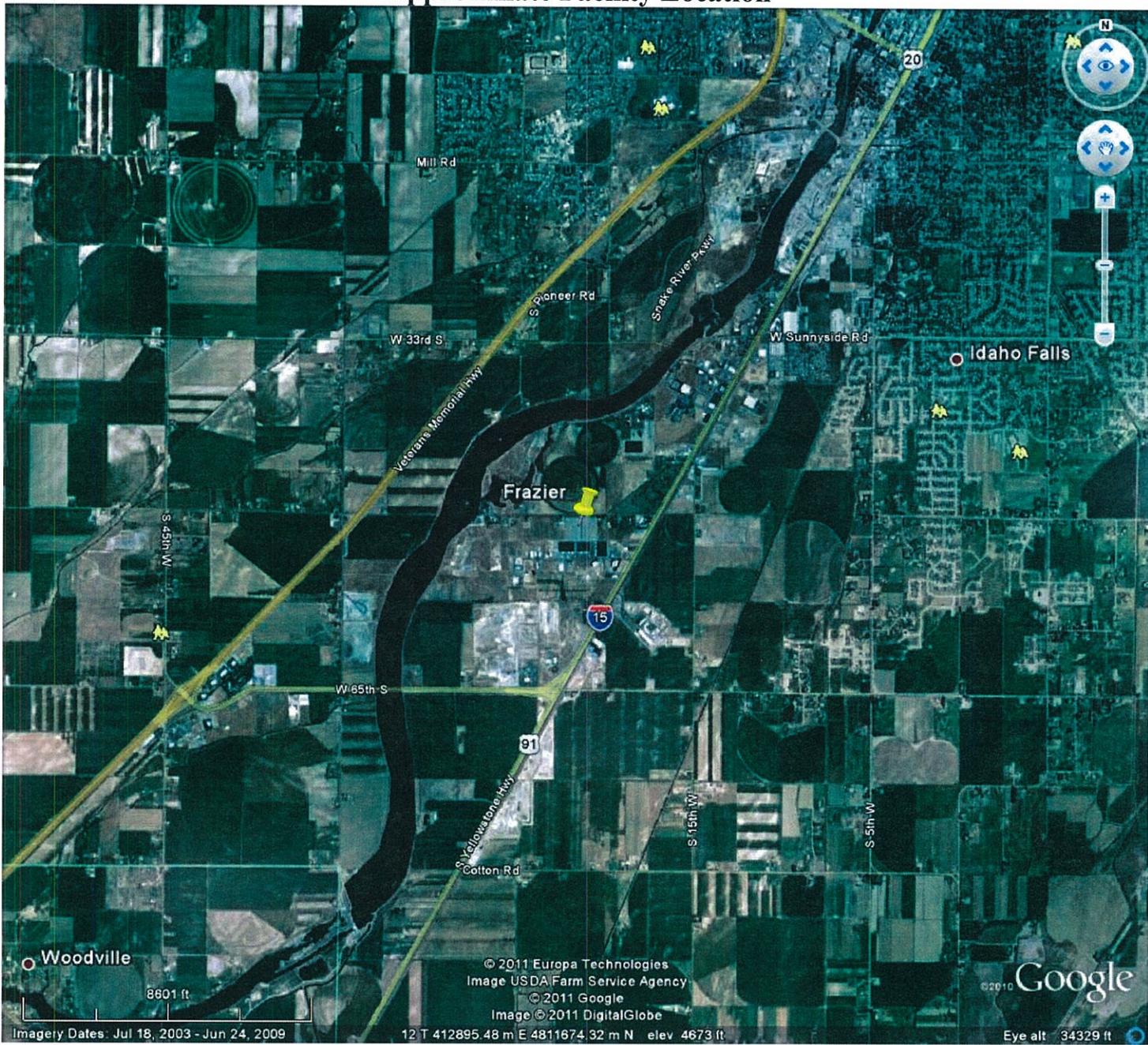
5.0 PROPOSED PERMIT LIMITS

The following usage limits are being requested for the dip painting and welding operations.

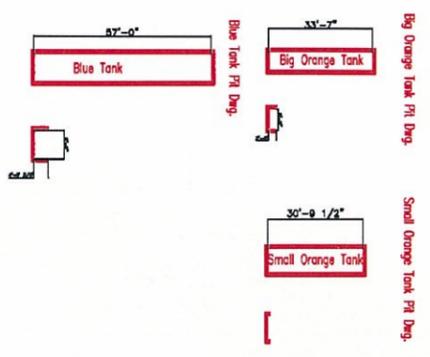
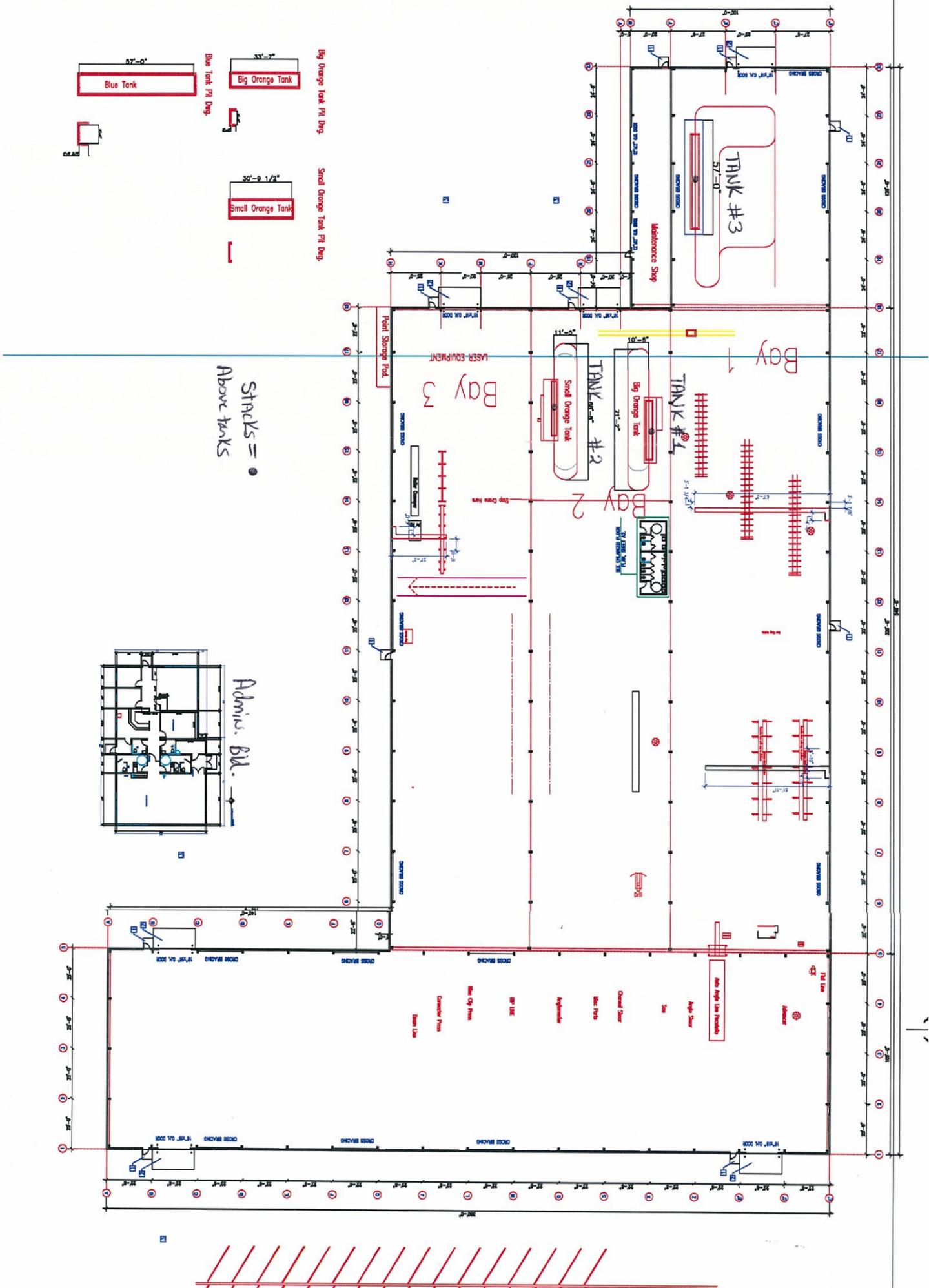
- Orange paint usage not to exceed 10,000 gallons per year
- Blue paint usage not to exceed 16,000 gallons per year
- Yellow paint usage not to exceed 4,000 gallons per year
- Solvent usage not to exceed 9,300 gallons per year
- Welding wire usage not to exceed 200,000 pounds per year

APPENDIX A
LOCATION MAP AND PLOT PLAN

Approximate Facility Location



Facility Plot Plan



Stacks = ●
Above tanks

Admin. Bld.



APPENDIX B
INFORMATION MEETING ANNOUNCEMENT

APPENDIX C
PTC APPLICATION FORMS



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Cover Sheet for Air Permit Application – Permit to Construct **Form CSPTC**

Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name	Frazier Industrial Company		
2. Facility Name	Idaho Falls Plant	3. Facility ID No.	NA
4. Brief Project Description - One sentence or less	Manufacturer of Structural Steel Storage Systems		
PERMIT APPLICATION TYPE			
5.	<input checked="" type="checkbox"/> New Source <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> PTC for a Tier I Source Processed Pursuant to IDAPA 58.01.01.209.05.c <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Facility Emissions Cap <input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____ <input type="checkbox"/> Required by Enforcement Action: Case No.: _____		
6.	<input checked="" type="checkbox"/> Minor PTC <input type="checkbox"/> Major PTC		
FORMS INCLUDED			
Included	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form CSPTC – Cover Sheet	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1– Industrial Engine Information Please specify number of EU1s attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2– Nonmetallic Mineral Processing Plants Please specify number of EU2s attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3– Spray Paint Booth Information Please specify number of EU3s attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4– Cooling Tower Information Please specify number of EU3s attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please specify number of EU4s attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP– Concrete Batch Plant Please specify number of CBPs attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please specify number of HMAPs attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	PERF – Portable Equipment Relocation Form	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form AO – Afterburner/Oxidizer	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CA – Carbon Adsorber	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CYS – Cyclone Separator	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form ESP – Electrostatic Precipitator	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form BCE– Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE– Scrubbers Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form VSCE – Venturi Scrubber Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CAM – Compliance Assurance Monitoring	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI– Emissions Inventory	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>



Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION	
1. Company Name	2. Facility Name:
Frazier Industrial Company	Idaho Falls Plant
3. Brief Project Description:	Manufacturer of Structural Steel Storage Systems
FACILITY INFORMATION	
4. Primary Facility Permit Contact Person/Title	Richard Peake Industrial Engineer
5. Telephone Number and Email Address	(843) 326-1477 ext 5 rpeake@frazier.com
6. Alternate Facility Contact Person/Title	Mike Westbrook Plant Manager
7. Telephone Number and Email Address	mwestbrook@frazier.com
8. Address to Which the Permit Should be Sent	4537 Lamar Highway
9. City/County/State/Zip Code	Lamar Darlington SC 29069
10. Equipment Location Address (if different than the mailing address above)	2255 West 49th South
11. City/County/State/Zip Code	Idaho Falls Bonneville ID 83402
12. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
13. SIC Code(s) and NAICS Code	Primary SIC: 2542 Secondary SIC: NAICS: 337215
14. Brief Business Description and Principal Product	Structural steel storage systems
15. Identify any adjacent or contiguous facility that this company owns and/or operates	NA
16. Specify the reason for the application	<input checked="" type="checkbox"/> Permit to Construct (PTC) <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p><u>For Tier I permitted facilities only.</u> If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit.</p> <input type="checkbox"/> Incorporate the PTC at the time of the Tier I renewal <input type="checkbox"/> Co-process the Tier I modification and PTC <input type="checkbox"/> Administratively amend the Tier I permit to incorporate the PTC upon your request (IDAPA 58.01.01.209.05.a, b, or c) </div> <input type="checkbox"/> Tier I Permit <input type="checkbox"/> Tier II Permit <input type="checkbox"/> Tier II/Permit to Construct
CERTIFICATION	
In accordance with IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.	
17. Responsible Official's Name/Title	Richard Peake Industrial Engineer
18. Responsible Official's Signature	<i>Richard W. Peake</i> Date: 6-30-2011
19. <input checked="" type="checkbox"/> Check here to indicate that you would like to review the draft permit prior to final issuance.	



Please see instructions on page 2 before filling out the form.

IDENTIFICATION							
1. Company Name: Frazier Industrial Company		2. Facility Name: Idaho Falls Plant		3. Facility ID No:			
4. Brief Project Description:		Manufacturer of structural steel storage systems					
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION							
5. Emissions Unit (EU) Name:		DIP TANK #1					
6. EU ID Number:		T01					
7. EU Type:		<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source		Date Issued:			
		<input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:					
8. Manufacturer:		INTERNALLY FABRICATED					
9. Model:		INTERNALLY FABRICATED					
10.. Maximum Capacity:		3,636					
11. Date of Construction:							
12. Date of Modification (if any):							
13. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, complete the following section. If No, go to line 22.					
EMISSIONS CONTROL EQUIPMENT							
14. Control Equipment Name and ID:							
15. Date of Installation:		16. Date of Modification (if any):					
17. Manufacturer and Model Number:							
18. ID(s) of Emission Unit Controlled:							
19. Is operating schedule different than emission units(s) involved?		<input type="checkbox"/> Yes <input type="checkbox"/> No					
20. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
		Pollutant Controlled					
		PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency							
21. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.							
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)							
22. Actual Operation:		5,600 HOUR/YEAR					
23. Maximum Operation:		8,760 HOUR/YEAR					
REQUESTED LIMITS							
24. Are you requesting any permit limits?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, indicate all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):							
<input type="checkbox"/> Production Limit(s):							
<input checked="" type="checkbox"/> Material Usage Limit(s):		10,000 GALLONS ORANGE PAINT + SOLVENT					
<input type="checkbox"/> Limits Based on Stack Testing:		Please attach all relevant stack testing summary reports					
<input type="checkbox"/> Other:							
25. Rationale for Requesting the Limit(s):		MAXIMUM PROJECTED PAINT AND SOLVENT USAGE					



Please see instructions on page 2 before filling out the form.

IDENTIFICATION						
1. Company Name: Frazier Industrial Company		2. Facility Name: Idaho Falls Plant			3. Facility ID No:	
4. Brief Project Description:		Manufacturer of structural steel storage systems				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
5. Emissions Unit (EU) Name:		DIP TANK #2				
6. EU ID Number:		T02				
7. EU Type:		<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:			Date Issued:	
8. Manufacturer:		INTERNALLY FABRICATED				
9. Model:		INTERNALLY FABRICATED				
10. Maximum Capacity:		1,793				
11. Date of Construction:						
12. Date of Modification (if any):						
13. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, complete the following section. If No, go to line 22.				
EMISSIONS CONTROL EQUIPMENT						
14. Control Equipment Name and ID:						
15. Date of Installation:				16. Date of Modification (if any):		
17. Manufacturer and Model Number:						
18. ID(s) of Emission Unit Controlled:						
19. Is operating schedule different than emission units(s) involved?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
20. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)				
Control Efficiency		Pollutant Controlled				
		PM	PM10	SO ₂	NO _x	VOC
21. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
22. Actual Operation:		5,600 HOUR/YEAR				
23. Maximum Operation:		8,760 HOUR/YEAR				
REQUESTED LIMITS						
24. Are you requesting any permit limits?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, indicate all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input checked="" type="checkbox"/> Material Usage Limit(s):		10,000 GALLONS ORANGE PAINT + SOLVENT				
<input type="checkbox"/> Limits Based on Stack Testing:		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
25. Rationale for Requesting the Limit(s):		MAXIMUM PROJECTED PAINT AND SOLVENT USAGE				



Please see instructions on page 2 before filling out the form.

IDENTIFICATION						
1. Company Name: Frazier Industrial Company		2. Facility Name: Idaho Falls Plant			3. Facility ID No:	
4. Brief Project Description:				Manufacturer of structural steel storage systems		
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
5. Emissions Unit (EU) Name:		DIP TANK #3				
6. EU ID Number:		T03				
7. EU Type:		<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source		Date Issued:		
		<input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:				
8. Manufacturer:		INTERNALLY FABRICATED				
9. Model:		INTERNALLY FABRICATED				
10.. Maximum Capacity:		8,311				
11. Date of Construction:						
12. Date of Modification (if any):						
13. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, complete the following section. If No, go to line 22.				
EMISSIONS CONTROL EQUIPMENT						
14. Control Equipment Name and ID:						
15. Date of Installation:			16. Date of Modification (if any):			
17. Manufacturer and Model Number:						
18. ID(s) of Emission Unit Controlled:						
19. Is operating schedule different than emission units(s) involved?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
20. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)				
		Pollutant Controlled				
		PM	PM10	SO ₂	NO _x	VOC
Control Efficiency						CO
21. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
22. Actual Operation:		5,600 HOUR/YEAR				
23. Maximum Operation:		8,760 HOUR/YEAR				
REQUESTED LIMITS						
24. Are you requesting any permit limits?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, indicate all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input checked="" type="checkbox"/> Material Usage Limit(s):		16,000 GALLONS BLUE PAINT + SOLVENT OR YELLOW PAINT				
<input type="checkbox"/> Limits Based on Stack Testing:		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
25. Rationale for Requesting the Limit(s):		MAXIMUM PROJECTED PAINT AND SOLVENT USAGE				



Please see instructions on page 2 before filling out the form.

IDENTIFICATION							
1. Company Name:	2. Facility Name:		3. Facility ID No:				
Frazier Industrial Company	Idaho Falls Plant						
4. Brief Project Description:		Manufacturer of structural steel storage systems					
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION							
5. Emissions Unit (EU) Name:	STEEL WELDING						
6. EU ID Number:	W01						
7. EU Type:	<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:				
8. Manufacturer:							
9. Model:							
10. Maximum Capacity:	200,000 LB/YR WELDING ELECTODE						
11. Date of Construction:							
12. Date of Modification (if any):							
13. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, complete the following section. If No, go to line 22.						
EMISSIONS CONTROL EQUIPMENT							
14. Control Equipment Name and ID:							
15. Date of Installation:			16. Date of Modification (if any):				
17. Manufacturer and Model Number:							
18. ID(s) of Emission Unit Controlled:							
19. Is operating schedule different than emission units(s) involved? <input type="checkbox"/> Yes <input type="checkbox"/> No							
20. Does the manufacturer guarantee the control efficiency of the control equipment? <input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)							
		Pollutant Controlled					
		PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency							
21. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.							
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)							
22. Actual Operation:		5,600 HR/YEAR					
23. Maximum Operation:		8,760 HR/YEAR					
REQUESTED LIMITS							
24. Are you requesting any permit limits? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, indicate all that apply below)							
<input type="checkbox"/> Operation Hour Limit(s):							
<input type="checkbox"/> Production Limit(s):							
<input checked="" type="checkbox"/> Material Usage Limit(s):		200,000 LB/YR WIRE					
<input type="checkbox"/> Limits Based on Stack Testing:		Please attach all relevant stack testing summary reports					
<input type="checkbox"/> Other:							
25. Rationale for Requesting the Limit(s):		MAXIMUM PROJECTED USAGE					

POTENTIAL TO EMIT

	PM-10 (lb/hr)	PM-10 (T/yr)	Lead (lb/hr)	Lead (T/yr)	VOC (lb/hr)	VOC (T/yr)	HAP (lb/hr)	HAP (T/yr)
Dip Tank 1 ^{a b c} Orange					13.97	27.69	0.77	1.42
Dip Tank 2 ^{b c} Orange or Yellow					13.97	33.11	0.77	1.45
Dip Tank 3 ^c Blue					13.96	37.50	0.13	0.36
Welding Total ^{d e}	0.13	0.35	1.3E-05	3.5E-05			0.0001	0.0002
Welding 1	0.006	0.02	6.3E-07	1.8E-06				
Welding 2	0.006	0.02	6.3E-07	1.8E-06				
Welding 3	0.006	0.02	6.3E-07	1.8E-06				
Welding 4	0.006	0.02	6.3E-07	1.8E-06				
Welding 5	0.006	0.02	6.3E-07	1.8E-06				
Welding 6	0.006	0.02	6.3E-07	1.8E-06				
Welding 7	0.006	0.02	6.3E-07	1.8E-06				
Welding 8	0.006	0.02	6.3E-07	1.8E-06				
Welding 9	0.006	0.02	6.3E-07	1.8E-06				
Welding 10	0.006	0.02	6.3E-07	1.8E-06				
Welding 11	0.006	0.02	6.3E-07	1.8E-06				
Welding 12	0.006	0.02	6.3E-07	1.8E-06				
Welding 13	0.006	0.02	6.3E-07	1.8E-06				
Welding 14	0.006	0.02	6.3E-07	1.8E-06				
Welding 15	0.006	0.02	6.3E-07	1.8E-06				
Welding 16	0.006	0.02	6.3E-07	1.8E-06				
Welding 17	0.006	0.02	6.3E-07	1.8E-06				
Welding 18	0.006	0.02	6.3E-07	1.8E-06				
Welding 19	0.006	0.02	6.3E-07	1.8E-06				
Welding 20	0.006	0.02	6.3E-07	1.8E-06				
Total	0.13	0.35	1.3E-05	3.5E-05	41.90	98.30	1.67	3.23



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline - 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 4/5/2007

Please see instructions on page 2 before filling out the form.

Company Name:	Frazier Industrial Company
Facility Name:	Idaho Falls Plant
Facility ID No.:	
Brief Project Description:	Manufacturer of Structural Steel Storage Systems

SUMMARY OF AIR IMPACT ANALYSIS RESULTS - CRITERIA POLLUTANTS

Criteria Pollutants	Averaging Period	1.	2.	3.	4.	NAAQS ($\mu\text{g}/\text{m}^3$)	Percent of NAAQS
		Significant Impact Analysis Results ($\mu\text{g}/\text{m}^3$)	Significant Contribution Level ($\mu\text{g}/\text{m}^3$)	Full Impact Analysis Results ($\mu\text{g}/\text{m}^3$)	Background Concentration ($\mu\text{g}/\text{m}^3$)		
PM ₁₀	24-hour	Not req'd	5			150	
	Annual	Not req'd	1			50	
SO ₂	3-hr	Not req'd	25			1300	
	24-hr	Not req'd	5			365	
	Annual	Not req'd	1			80	
NO ₂	Annual	Not req'd	1			100	
CO	1-hr	Not req'd	2000			10000	
	8-hr	Not req'd	500			40000	

		DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-5PERMIT				PERMIT TO CONSTRUCT APPLICATION Revision 3 3/27/2007					
<i>Please see instructions on page 2 before filling out the form.</i>											
Company Name:		Frazier Industrial Company									
Facility Name:		Idaho Falls Plant									
Facility ID No.:											
Brief Project Description:		Manufacturer of Structural Steel Storage Systems									
POINT SOURCE STACK PARAMETERS											
1.	2.	3a.	3b.	4.	5.	6.	7.	8.	9.	10.	
Emissions units	Stack ID	UTM Easting (m)	UTM Northing (m)	Base Elevation (m)	Stack Height (m)	Modeled Diameter (m)	Stack Exit Temperature (K)	Stack Exit Flowrate (acfm)	Stack Exit Velocity (m/s)	Stack orientation (e.g., horizontal, rain cap)	
Point Source(s)											
Dip Tank 1- Orange	BIGORANGE	412,781.89	4,811,704.66	1,424.47	11.89	0.61	0.00	0.62	0.001	Vertical, raincap	
Dip Tank 2- Orange	SMORANGE	412,778.87	4,811,691.16	1,424.47	11.89	0.61	0.00	0.62	0.001	Vertical, raincap	
Dip Tank 3- Blue	BLUESTACK	412,743.86	4,811,709.92	1,424.47	15.54	0.61	0.00	0.62	0.001	Vertical, raincap	



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline - 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 4/5/2007

Please see instructions on page 2 before filling out the form.

Company Name: Frazier Industrial Company

Facility Name: Idaho Falls Plant

Facility ID No.:

Brief Project Description: Manufacturer of Structural Steel Storage Systems

FUGITIVE SOURCE PARAMETERS

1.	2.	3a.	3b.	4.	5.	6.	7.	8.	9.	10.
Emissions units	Stack ID	UTM Easting (m)	UTM Northing (m)	Base Elevation (m)	Release Height (m)	Easterly Length (m)	Northerly Length (m)	Angle from North (°)	Initial Vertical Dimension (m)	Initial Horizontal Dimension (m)
Area Source(s)										
No fugitive sources										
Volume Source(s)										
(insert more rows as needed)										



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

AIR PERMIT APPLICATION

Revision 6
 10/7/09

For each box in the table below, CTRL+click on the blue underlined text for instructions and information.

IDENTIFICATION	
1. Company Name: Frazier Industrial Company	2. Facility Name: Idaho Falls Plant
3. Brief Project Description: Manufacturer of Structural Steel Storage Systems	
APPLICABILITY DETERMINATION	
4. List applicable subparts of the New Source Performance Standards (NSPS) (40 CFR part 60). Examples of NSPS affected emissions units include internal combustion engines, boilers, turbines, etc. The applicant must thoroughly review the list of affected emissions units.	List of applicable subpart(s): <input type="checkbox"/> Not Applicable x
5. List applicable subpart(s) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR part 61 and 40 CFR part 63 . Examples of affected emission units include solvent cleaning operations, industrial cooling towers, paint stripping and miscellaneous surface coating. EPA has a web page dedicated to NESHAP that should be useful to applicants.	List of applicable subpart(s): Subpart XXXXXX <input type="checkbox"/> Not Applicable
6. For each subpart identified above, conduct a complete a regulatory analysis using the instructions and referencing the example provided on the following pages. Note - Regulatory reviews must be submitted with sufficient detail so that DEQ can verify applicability and document in legal terms why the regulation applies. Regulatory reviews that are submitted with insufficient detail will be determined incomplete.	<input type="checkbox"/> A detailed regulatory review is provided (Follow instructions and example). <input type="checkbox"/> DEQ has already been provided a detailed regulatory review. Give a reference to the document including the date.
<p>IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT</p> <p><i>It is emphasized that it is the applicant's responsibility to satisfy all technical and regulatory requirements, and that DEQ will help the applicant understand what those requirements are <u>prior</u> to the application being submitted but that DEQ will not perform the required technical or regulatory analysis on the applicant's behalf.</i></p>	

e-CFR Data is current as of June 10, 2011

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)

[Browse Previous](#) | [Browse Next](#)

Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Source: 73 FR 43000, July 23, 2008, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11514 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"

(1) Electrical and Electronic Equipment Finishing Operations;

(2) Fabricated Metal Products;

(3) Fabricated Plate Work (Boiler Shops);

(4) Fabricated Structural Metal Manufacturing;

(5) Heating Equipment, except Electric;

(6) Industrial Machinery and Equipment Finishing Operations;

(7) Iron and Steel Forging;

(8) Primary Metal Products Manufacturing; and

(9) Valves and Pipe Fittings.

(b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

(1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

(2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.

(3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes 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). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

(5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.

(d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.

(e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"

(g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.

(i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

Regulatory Analysis: The Frazier Industrial Company Idaho Falls Facility (Frazier) is subject to subpart XXXXXX because the operations fall under the source category of Fabricated Metal Products and it will be considered a new area source. The welding wire and/or steel that Frazier will use have the potential to emit metal fabrication or finishing metal HAP (MFHAP). The welding operations have the potential to emit the following MFHAPs : manganese, nickel, chromium and lead. See Appendix F manufacturer information for estimated welding fume gas generation data.

§ 63.11515 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

Regulatory Analysis: Frazier will achieve compliance upon startup of the new facility.

Standards and Compliance Requirements

§ 63.11516 What are my standards and management practices?

(a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry abrasive blasting 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 abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

(i) You must minimize dust generation during emptying of abrasive blasting enclosures; and

(ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.

(i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you 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), "What are my notification, recordkeeping, and reporting requirements?"

(ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing 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, you 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. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

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

(B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and

(D) You 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, you 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.

(ii) You 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, you 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, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You 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?"

(iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."

(B) You 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 your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining 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 machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(2) You must operate all equipment associated with machining according to manufacturer's instructions.

(c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2)

of this section 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) You must capture emissions and vent them to a filtration control device. You 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) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

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

(ii) 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.

(d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.

(1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

(i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

(ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. 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.

(iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."

(iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.

(2) *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, September 26, 2002", Revision 0 (incorporated by reference, see §63.14).

(3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

(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.

(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 paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.

(6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.

(i) A list of all current personnel by name and job description who are required to be trained;

(ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.

(A) 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.

(B) 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.

(C) Routine spray booth and filter maintenance, including filter selection and installation.

(D) Environmental compliance with the requirements of this subpart.

(iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.

(7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."

(8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.

(i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the

date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

(e) [Reserved]

(f) *Standards for welding.* If you own or operate a new or existing welding affected source, you 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 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 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.

(1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You 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), "Notification, recordkeeping, and reporting requirements."

(2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

(i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;

(iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You 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), "Notification, recordkeeping, and reporting requirements."

(4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.

(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) 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 your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(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 paragraphs (f)(5)(i) through (iv) of this section.

(i) 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 §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

(iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

(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 paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, 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 paragraph (f)(2) of this section.

(7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.

(i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(iii) 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 §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."

(v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(8) *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.

(i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.

(A) Company name and address;

(B) A list and description of all welding operations which currently comprise the welding affected source;

(C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;

(D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;

(E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and

(F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.

(ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(iii) You 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), "Notification, recordkeeping, and reporting requirements."

Regulatory Analysis: Frazier will use more than 2,000 lbs of welding wire that has the potential to emit MFHAPs. Frazier will operate all equipment associated with welding operations according to manufacturer's instructions and will maintain records of the manufacturer's instructions.

Frazier will implement the following management practices to minimize emissions of MFHAPs:

- Gas metal arc welding (GMAW)—also called metal inert gas welding (MIG)

Frazier will perform visual determinations of welding fugitive emissions as specified in §63.11517(b) and will 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). If visible fugitive emissions are detected during any visual determination Frazier will 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. Frazier will also perform a follow-up inspection after all corrective action is taken. Frazier will 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 their annual certification report.

If visible fugitive emissions are detected more than once during any consecutive 12 month period Frazier will comply with paragraphs (f)(5)(i) through (iv) of this section. Frazier will also perform corrective action for opacities less than or equal to 20 percent but greater than zero and also opacities that exceed 20 percent.

Frazier will also report all opacities exceeding 20 percent and prepare and implement a Frazier will develop a Site-Specific Welding Emissions Management Plan as outlined in (f)(8).

§ 63.11517 What are my monitoring requirements?

(a) *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 part 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.

(b) *Visual determination of fugitive emissions, graduated schedule.* Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(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.

(2) *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you 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, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you 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, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you 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, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

(c) *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.

(d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(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.

(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 performed in accordance with paragraph (d)(1) of this section 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 according to the requirements of paragraph (d)(1) of this section.

(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 performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four 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 according to the requirements of paragraph (d)(2) of this section.

(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 performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three 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 according to the requirements of paragraph (d)(3) of this section.

(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 performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

Regulatory Analysis: Frazier will follow the visible determination of fugitive emissions schedule and procedures as outlined in 63.11517(a)-(d) above.

§ 63.11518 [Reserved]

§ 63.11519 What are my notification, recordkeeping, and reporting requirements?

(a) *What notifications must I submit? —(1) Initial notification.* If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 “Am I subject to this subpart?,” you must submit the Initial Notification required by §63.9(b) “General Provisions,” for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011. Your Initial Notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

(2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), “Compliance demonstration,” or §63.11516(e)(4)(ix)(C), “Compliance demonstration,” as applicable; and

(iv) The date of the notification of compliance status.

(b) *What reports must I prepare or submit?* –(1) *Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.

(2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. 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.

(i) 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.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) 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 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.

(3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."

(i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

(ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedances of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedances in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. 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.

(5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;

(ii) A description of the corrective actions taken subsequent to the test; and

(iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

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

(7) [Reserved]

(8) *Exceedences of 20 percent opacity for welding affected sources.* 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.

- (A) The date on which the exceedence occurred; and
- (B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(9) *Site-specific Welding Emissions Management Plan reporting.* You 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 your 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 your annual certification and compliance report, according to the requirements in paragraph (b)(1) of this section.

(c) *What records must I keep?* You must collect and keep records of the data and information specified in paragraphs (c)(1) through (13) of this section, according to the requirements in paragraph (c)(14) of this section.

(1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.

- (i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
- (ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), "Am I subject to this subpart," 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.

(2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

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

(3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

- (i) The date of every visual determination of emissions opacity; and

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"

(5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."

(6) *Waterspray booth or water curtain efficiency tests.* 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."

(7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." 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), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.

(8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.

(9)–(10) [Reserved]

(11) *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, in accordance with §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."

(12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.

(13) *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.

(14) *Welding Rod usage.* If you operate a new or existing 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.

(15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.

(i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(ii) As specified in §63.10(b)(1), "General Provisions," you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(iii) 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), "General Provisions." You may keep the records off-site for the remaining 3 years.

Regulatory Analysis: Frazier will submit an initial notification and notification of compliance status no later than 120 days after initial startup. Frazier will submit an annual compliance and certification report which will begin the day after the compliance date and ends on December 31 and will be submitted by January 31.

§ 63.11520 [Reserved]

Other Requirements and Information

§ 63.11521 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your state, local, or tribal agency. If the EPA Administrator has delegated authority to your state, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your state, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.

(c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under §63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A "major change to test method" is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A "major change to monitoring" under is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A "major change to recordkeeping/reporting" is defined in §63.90.

Regulatory Analysis: EPA is the administrator for this Subpart because EPA has not delegated this Subpart to DEQ at the time of the permit issuance. All required compliance records and documents are to be submitted to EPA and to copy to DEQ, Air Division as courtesy.

§ 63.11522 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

Adequate emission capture methods are hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans designed to draw greater than 85 percent of the airborne dust generated from the process into the control device.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

Cartridge collector means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge collectors can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

Confined abrasive blasting enclosure means an enclosure that includes a roof and at least two complete walls, with side curtains and ventilation as needed to insure that no air or PM exits the enclosure while dry abrasive blasting is performed. Apertures or slots may be present in the roof or walls to allow for mechanized transport of the blasted objects with overhead cranes, or cable and cord entry into the dry abrasive blasting chamber.

Control device means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

Dry abrasive blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

Dry grinding and dry polishing with machines means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

Fabric filter means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media; a fabric filter is also known as a baghouse.

Facility maintenance means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

Filtration control device means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

Grinding means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Metal fabrication and finishing source categories are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of

the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the DoD, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: Confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Paint means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

Polishing with machines means an operation which removes fine excess metal from a surface to prepare the surface for more refined finishing procedures prior to plating or other processes. Polishing may also be employed to remove burrs on castings or stampings. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. Polishing performed by hand without machines or in bench top operations are not considered polishing with machines for the purposes of this subpart.

Primarily engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

Quality control activities means operations that meet all of the following criteria:

(1) The activities are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are not sold and do not leave the facility.

(3) The activities are not a normal part of the operation;

(4) The activities do not involve fabrication of tools, equipment, machinery, and structures that comprise the infrastructure of the facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Responsible official means responsible official as defined in 40 CFR 70.2.

Spray-applied painting means application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purposes of this subpart, spray-applied painting does not include the following materials or activities:

(1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Spray booth or spray room means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

Tool or equipment repair means equipment and devices used to repair or maintain process equipment or to prepare molds, dies, or other changeable elements of process equipment.

Totally enclosed and unvented means enclosed so that no air enters or leaves during operation.

Totally enclosed and unvented dry abrasive blasting chamber means a dry abrasive blasting enclosure which has no vents to the atmosphere, thus no emissions. A typical example of this sort of abrasive blasting enclosure is a small "glove box" enclosure, where the worker places their hands in openings or gloves that extend into the box and enable the worker to hold the objects as they are being blasted without allowing air and blast material to escape the box.

Vented dry abrasive blasting means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

Welding means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.

§ 63.11523 What General Provisions apply to this subpart?

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11514(a) are specified in Table 2 of this subpart.

Table 1 to Subpart XXXXXX of Part 63—Description of Source Categories Affected by This Subpart

Metal fabrication and finishing source category	Description
Electrical and Electronic Equipment Finishing Operations	Establishments primarily engaged in manufacturing motors and generators; and electrical machinery, equipment, and supplies, not elsewhere classified. The electrical machinery equipment and supplies industry sector of this source category includes establishments primarily engaged in high energy particle acceleration systems and equipment, electronic simulators, appliance and extension cords, bells and chimes, insect traps, and other electrical equipment and supplies not elsewhere classified. The motors and generators sector of this source category includes establishments primarily engaged in manufacturing electric motors (except engine starting motors) and power generators; motor generator sets; railway motors and control equipment; and motors, generators and control equipment for gasoline, electric, and oil-electric buses and trucks.
Fabricated Metal Products	Establishments primarily engaged in manufacturing fabricated metal products, such as fire or burglary resistive steel safes and vaults and similar fire or burglary resistive products; and

	collapsible tubes of thin flexible metal. Also, establishments primarily engaged in manufacturing powder metallurgy products, metal boxes; metal ladders; metal household articles, such as ice cream freezers and ironing boards; and other fabricated metal products not elsewhere classified.
Fabricated Plate Work (Boiler Shops)	Establishments primarily engaged in manufacturing power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
Fabricated Structural Metal Manufacturing	Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
Heating Equipment, except Electric	Establishments primarily engaged in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels. Products produced in this source category include low-pressure heating (steam or hot water) boilers, fireplace inserts, domestic (steam or hot water) furnaces, domestic gas burners, gas room heaters, gas infrared heating units, combination gas-oil burners, oil or gas swimming pool heaters, heating apparatus (except electric or warm air), kerosene space heaters, gas fireplace logs, domestic and industrial oil burners, radiators (except electric), galvanized iron nonferrous metal range boilers, room heaters (except electric), coke and gas burning salamanders, liquid or gas solar energy collectors, solar heaters, space heaters (except electric), mechanical (domestic and industrial) stokers, wood and coal-burning stoves, domestic unit heaters (except electric), and wall heaters (except electric).
Industrial Machinery and Equipment Finishing Operations	Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plant overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes, and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment manufacturing sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.
Iron and Steel Forging	Establishments primarily engaged in the forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings. The forging process is different from the casting and foundry processes, as metal used to make forged parts is never melted and poured.
Primary Metals Products Manufacturing	Establishments primarily engaged in manufacturing products such as fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls; nonferrous metal brads and nails; nonferrous metal spikes, staples, and tacks; and other primary metals products not elsewhere classified.
Valves and Pipe Fittings	Establishments primarily engaged in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

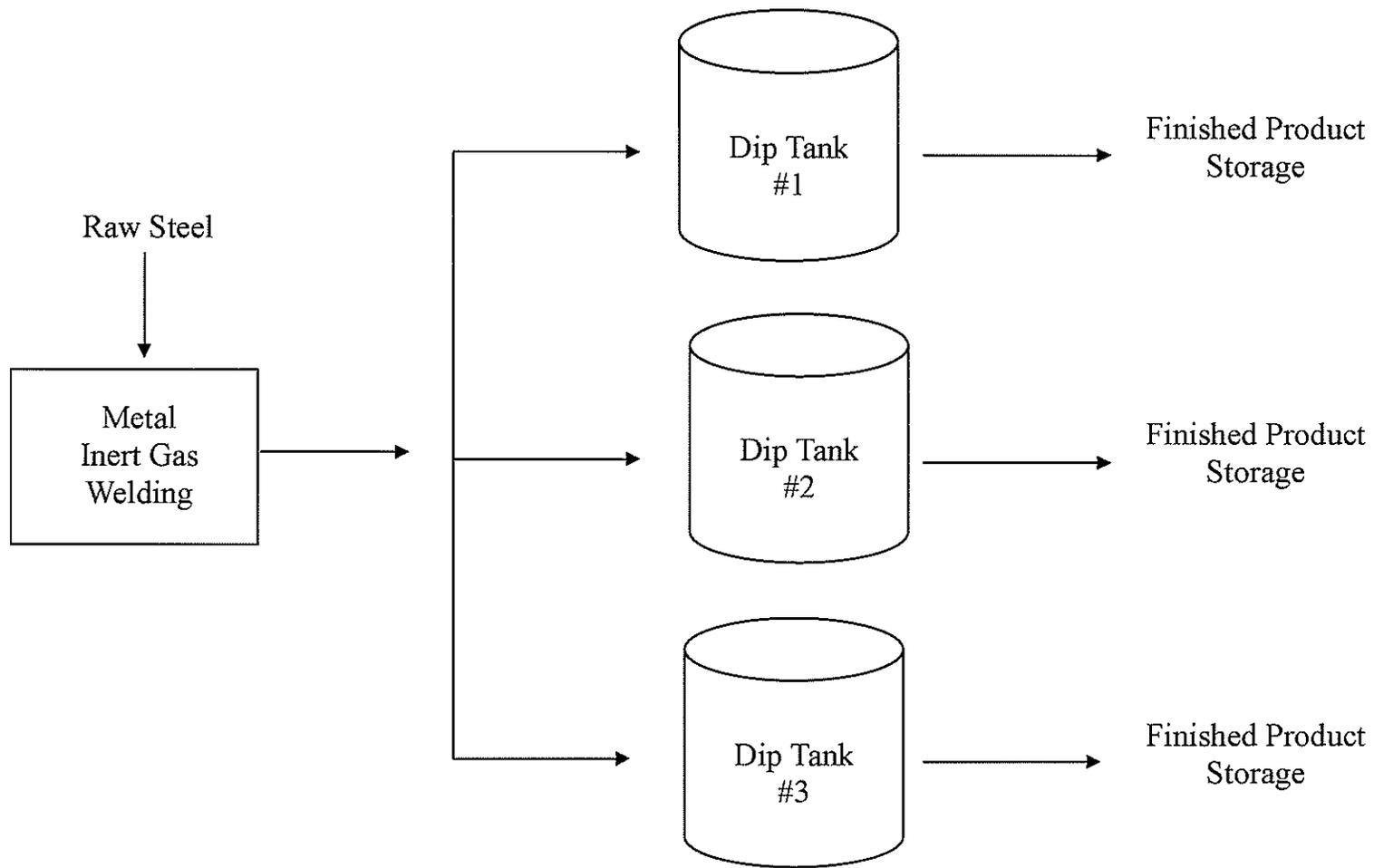
Table 2—to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Instructions for Table 2—As required in §63.11523, "General Provisions Requirements," you must meet each requirement in the following table that applies to you.

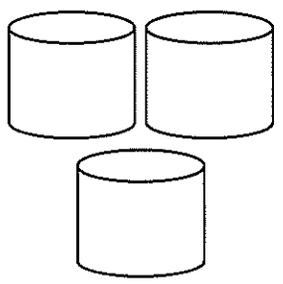
Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)–(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	Recordkeeping and reporting.
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.

APPENDIX D
PROCESS FLOW DIAGRAM



Paint & Solvent Storage



APPENDIX E
EMISSION INVENTORY

	POTENTIAL TO EMIT				STACK PARAMETERS							
	PM-10 (lb/hr)	PM-10 (T/yr)	Lead (lb/hr)	Lead (T/yr)	VOC (lb/hr)	VOC (T/yr)	HAP (lb/hr)	HAP (T/yr)	Ht (ft)	Diam (in)	Flow Rt. (cfm)	Temp (oF)
Dip Tank 1 ^{a b c} Orange					13.97	27.69	0.77	1.42	39	24	8230	amb
Dip Tank 2 ^{b c} Orange or Yellow					13.97	33.11	0.77	1.45	39	24	8230	amb
Dip Tank 3 ^c Blue					13.96	37.50	0.13	0.36	51	24	8230	amb
Welding Total ^{d e}	0.13	0.35	1.3E-05	3.5E-05			0.0001	0.0002				
Welding 1	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 2	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 3	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 4	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 5	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 6	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 7	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 8	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 9	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 10	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 11	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 12	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 13	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 14	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 15	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 16	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 17	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 18	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 19	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 20	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Total	0.13	0.35	1.3E-05	3.5E-05	41.90	98.30	1.67	3.23				

^a Solvent is used in all three tanks. Assumed total solvent emissions are divided equally between the three tanks.

^b Yellow paint is occasionally used in Tank #2

Worst case annual tpy VOC and HAPs assumes orange + solvent in Tank #2 and yellow + solvent being used in Tank #2.

Worst case hourly lb/hr VOC and HAPs assumes orange + solvent in Tank #2

^c Dip tank stacks will have rain caps- vertical stacks

^d Welding vertical vents will have butterfly closure when fan is not operating

^e Welding emissions will be divided equally between 20 vents; 5 equally spaced down center of each Bay; 5 located throughout building based on ventilation needs.

**FRAZIER INDUSTRIAL COMPANY
POCATELLO, ID**

Source

Pollutant	Total (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
n-Butyl Alcohol	2	10	No
Xylene	1	29	No
Ethyl Benzene	0.2	29	No
Stoddard	1	35	No
Cumene	0.1	16.3	No
Trimethyl Benzene	12.9	8.2	Yes
Iron Oxide	0.106	0.333	No
Manganese	0.019	0.067	No
Nickel	1.3E-05	2.7E-05	No
Chromium	3.8E-05	0.033	No

**DIP TANK 1
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New Fast Dry Orange- High Solids
 Coating ID: 43-62154B
 Density (lb/gal): 10.33
 Potential Gallons Mixture Applied (gal/yr)^b: 10,000
 Max Potential Gallons (gal/hr)^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.094	2.92	4.87	na	na
n-Butyl Alcohol	71-36-3	0.025	0.79	1.31	na	na
Xylene (mixed isomers)	1330-20-7	0.0169	0.52	0.87	0.524	0.87
Ethyl Benzene	100-41-4	0.004	0.11	0.19	0.112	0.19
Other VOCs	108-67-8	0.1775	5.50	9.17	na	na
TOTAL^a		0.3176	9.84	16.40	0.64	1.06

^aOnly non-exempt VOC and HAP components are summed.

^bTotal Orange Paint Usage is 20,000 gal/yr and is divided between Tanks #1 and #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**DIP TANK 2
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New Fast Dry Orange- High Solids
Coating ID: 43-62154B
Density (lb/gal): 10.33
Potential Gallons Mixture Applied (gal/yr)^b: 10,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.094	2.92	4.87	na	na
n-Butyl Alcohol	71-36-3	0.025	0.79	1.31	na	na
Xylene (mixed isomers)	1330-20-7	0.017	0.52	0.87	0.52	0.87
Ethyl Benzene	100-41-4	0.004	0.11	0.19	0.11	0.19
Other VOCs	108-67-8	0.178	5.50	9.17	na	na
TOTAL ^a		0.3176	9.84	16.40	0.64	1.06

^aOnly non-exempt VOC and HAP components are summed.

^bTotal Orange Paint Usage is 20,000 gal/yr and is divided between Tanks #1 and #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**DIP TANK 3
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New FD Blue- HS Dip
Coating ID: 43-41491B
Density (lb/gal): 10.37
Potential Gallons Mixture Applied (gal/yr): 16,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.1000	3.11	8.30	na	na
n-Butyl Alcohol	71-36-3	0.026	0.82	2.18	na	na
Other VOCs ^b		0.190	5.90	15.74	na	na
TOTAL^a		0.316	9.83	26.22	na	na

^aOnly non-exempt VOC and HAP components are summed.

^bTotal volatile wt% from MSDS sheet = 31.6

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**YELLOW PAINT
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: X-9228 MDI Yellow UV Guard
Coating ID: Sheyboygan 43-62028
Density (lb/gal): 10.45
Potential Gallons Mixture Applied (gal/yr) ^b: 4,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4- Trimethylbenzene	64742-95-6	0.067	2.09	1.39	na	na
Ethyl Benzene	100-41-4	0.002	0.05	0.03	0.047	0.03
Stoddard Solvent	8052-41-3	0.033	1.02	0.68	na	na
Petroleum Naphtha	64742-48-9	0.020	0.61	0.41	na	na
n-Butyl Alcohol	71-36-3	0.010	0.32	0.21	na	na
Unspecified VOC		0.129	4.03	2.69	na	na
TOTAL ^a		0.259	8.12	5.42	0.05	0.03

^aOnly non-exempt VOC and HAP components are summed.

^bYellow paint is only used once or twice a year and usually in Dip Tank #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**SOLVENT MIXED IN TANKS
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: Aromatic 100 Solvent
Coating ID: EQ940652
Density (lb/gal): 7.29
Potential Gallons Mixture Applied (gal/yr): 9,300
Potential Gallons (gal/hr): 1.70

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.320	3.97	10.85	na	na
Cumene	98-82-8	0.010	0.12	0.34	0.124	0.34
Xylene	1330-20-7	0.022	0.27	0.75	0.273	0.75
Other VOCs	108-67-8	0.647	8.02	21.93	na	na
TOTAL^a		0.999	12.38	33.86	0.40	1.08

^aOnly non-exempt VOC and HAP components are summed.

PROPOSED EMISSIONS

Carbon Steel Electrode

Welding Wire Usage= 200,000 lb/yr
 Welding Hours= 5,600 hr/yr
 Welding Wire Usage= 35.71 lb/hr

Manufacturer's Data (see attached email)

Fume Generation Rate= 0.35 lb/100 lb welding wire
 Particulate Emission= 0.125 lb/hr

AP-42 Data ^a

GMAW 24.1 lb/10³ lb electrode
 Average for Electrode Type
 E70 5.2 lb/10³ lb electrode
 Particulate Emission= 0.186 lb/hr

Component ^b	Wt % Chemistry	TAP Y/N	HAP Y/N	PM10 Emissions	
				(lb/hr)	(tpy)
Particulate ^c				0.125	0.350
Iron Oxide	85%	Y	N	0.106	0.296
Manganese	15.4%	Y	N	0.019	0.054
Nickel	0.01%	Y	Y	1.3E-05	3.5E-05
Chromium	0.03%	Y	Y	3.8E-05	1.1E-04
Fluorine	0.01%	Y	N	1.3E-05	3.5E-05
Lead	0.01%	Y	Y	1.3E-05	3.5E-05

^a AP-42 Table 12-19.1

^b Source: Manufacturer's Information- Email from Kristopher Buck Hobart Brothers

^c Assume all particulate emissions are PM-10

APPENDIX F

MANUFACTURER INFORMATION AND MSDS

ORANGE PAINT

PRODUCT SPECIFICATIONS

SHEBOYGAN PAINT COMPANY
1439 NORTH 25th STREET
P.O. BOX 417
SHEBOYGAN, WI 53082-0417
TELEPHONE (920) 458-2157

DATE OF PREPARATION 01/03/11
PRINTED DATE 01/07/11
TRANSPORTATION EMERGENCY (800) 688-4005

CUSTOMER SERVICE custserv@shebpaint.com

TRADE NAME
NEW FAST DRY ORANGE HI-SOLIDS
DIP ENAMEL

MFG. PRODUCT NO.
43-62154B

CUSTOMER
PART NUMBER
WEIGHT PER GALLON
(density)

: Frazier- Pocatello
:
: 10.33 POUNDS

PERCENT SOLIDS

BY WEIGHT BY VOLUME
: 68.24 54.07

PERCENT WATER

:

PERCENT SOLVENT

: 31.76 45.93

% EXEMPT SOLVENT

:

VOC (WITH WATER AND EXEMPT SOLV):

3.28 LBS/GAL 393.07 GMS/LITER

VOC (LESS WATER AND EXEMPT SOLV):

3.28 LBS/GAL 393.07 GMS/LITER

PERCENT HAPS BY WEIGHT

: 2.36

VOC LBS PER GALLON SOLIDS

: 6.07

VOC KILOGRMS PER KILOGRMS SOLIDS:

.47

VOC HAPS LBS PER GALLON SOLIDS

: .45

VOC HAPS LBS PER LBS SOLIDS

: .03

FLASHPOINT (FAHRENHEIT)

: 101 F (ASTM D3828)

APPLICATION

: DIP

REDUCTION

: NONE

CURE

: AIR DRY

SUBSTRATE

: STEEL

COVERAGE

: 867.283 SQUARE FEET @ 1 MIL NO LOSS

VISC @ 80 F

: 20-27/3 ZAHN

CRYPTOMETER

: 8-15#7 WEDGE

GLOSS

: 85-95 OVERNIGHT DRY

COMMENTS

SECTION IV - FIRE & EXPLOSION HAZARDS

PROPER SHIPPING NAME - PAINT, 3, UN1263, III

(FLASH POINT > 100 DEGREES)

SHIPPING LABEL - NOT REGULATED IF QTY. LESS THAN 119 GALLONS

FLASHPOINT 101 F (ASTM D3828)

EXTINGUISHING MEDIA: Use carbon dioxide or dry chemical for small fires. For large fires, use an alcohol-type or multi-purpose foam extinguishing agent. Water may be ineffective to extinguish fires involving this type of product.

UNUSUAL FIRE & EXPLOSION HAZARDS: Handling dry materials or dust created from this product may pose an explosion hazard. Use explosion proof equipment. Avoid dust accumulations. Always electrically bond/ground processing equipment. Use good housekeeping practices to keep dust to a minimum. Smoke from burning product may be toxic. Spilled product, residue, or dust may burn fiercely if ignited. Runoff firefighting water may contain toxic or acidic materials.

SPECIAL FIRE FIGHTING PROCEDURES: Water may be used to cool closed containers to prevent pressure buildup. Keep people away from any fire fighting operations involving chemicals. Wear a self-contained positive pressure breathing apparatus in addition to full protective gear.

SECTION V - HEALTH HAZARD

EFFECTS OF OVEREXPOSURE: Irritation of the respiratory tract or acute nervous system depression characterized by headache, dizziness, staggered gait, confusion, unconsciousness, coma. There is no applicable information available regarding the carcinogen potential for this product as a whole, however any relevant information regarding any ingredient's status as a potential, suspect, or confirmed carcinogen is listed in SECTION V of the MSDS.

Chronic overexposure may damage the liver and/or kidneys, blood cells, cause cardiac sensations, hearing effects, and/or cause birth or fertility defects in lab animals.

Repeated and prolonged exposure to some solvents has been associated with permanent brain and nervous system damage.

Intentional misuse by deliberately concentrating & inhaling vapors from this product may be harmful or fatal.

This product contains aromatic naphtha, light which is on the New Jersey and Pennsylvania Right-to-Know list.

CAS# 64742-95-6.

Ingestion of alcohol can increase the effects of overexposure from some solvents in this product.

Exposure to XYLENE can affect the cardiovascular, pulmonary, CNS, and gastrointestinal systems. Liver enzymes, serum electrolytes, EKG and chest X-ray should be done in cases of massive exposure to xylene.

ETHYLBENZENE (CAS# 100-41-4) is present in this product. Ethylbenzene has been classified by IARC as a possible human carcinogen group 2B. * Ethylbenzene is a potential chronic health hazard and is on the New Jersey and Pennsylvania Right-to-Know lists.

This product contains xylenes, mixed isomers which is on the New Jersey and Pennsylvania Right-to-Know Lists.

(benzene, dimethyl-) CAS# 1330-20-7

This product contains 1,2,4-trimethylbenzene which is on the New Jersey and Pennsylvania Right-to-Know lists.

(Pseudocumene) CAS #96-63-3

This product contains 1,3,5-trimethylbenzene which is on the New Jersey Right-to-Know List. CAS# 108-67-0

Prolonged and continuous exposure to excessive concentration of dust of any kind without using a dust mask may have an adverse pulmonary effect on some people. This overexposure may result in coughing, sputum, and reduced lung capacity.

Pre-existing asthmatic conditions may worsen. Persons with lung diseases should not work in dusty areas unless a physician certifies their fitness to wear a respirator. (OSHA 1910.134). Liquid paint does not readily release dust.

Exposure Limits For Inert and Nuisance Dust Particulates Not Otherwise Classified: OSHA (PEL): TWA =15 mg/m3 (total dust) 5 mg/m3 (respirable fraction). ACGIH(TLV): TWA = 10 mg/m3 (total dust).

Exposure limits for n-Butanol: (CAS# 71-36-3 Butyl Alcohol) ACGIH(TLV): Ceiling = 50 ppm or 152 mg/m3.

This product contains n-Butyl Alcohol which is on the Pennsylvania & New Jersey Right-to-Know Lists.

Chemical Name: 1-Butanol CAS# 71-36-3

This product contains Titanium Dioxide, which is currently listed by OSHA and ACGIH as a nuisance dust hazard.

Exposure Limits for Titanium Dioxide(dust): OSHA (PEL): TWA =15 mg/m3 (total dust) 5mg/m3 (respirable)

ACGIH(TLV): TWA =10 mg/m3 (total dust).

This product contains Barium Sulfate which is listed by OSHA and ACGIH as a nuisance dust. Long term overexposure to barium sulfate dust may produce benign Pneumoconiosis termed "baritosis" and may reduce lung functions.

Exposure Limits For Barium Sulfate: (CAS# 7727-43-7) OSHA (PEL): TWA =10 mg/m3 (total dust), 5 mg/m3 (respirable)

ACGIH(TLV): TWA =10 mg/m3 (total dust).

This product contains Barium Sulfate which is on the New Jersey, Massachusetts or Pennsylvania Right-to-Know Lists.

CAS #7727-43-7

This product contains Talc (containing no asbestos) which is currently listed by OSHA & ACGIH as a nuisance dust hazard.

Prolonged exposure to dried talc particles can result in scarring of the lungs (talcosis) or of the covering of the lungs (pleural thickening). Excessive exposure to any dust may aggravate pre-existing respiratory conditions. Wet paint and paint overpray does not retain the hazardous properties of the dust particles.

Exposure Limits For Talc (containing no asbestos fibers): OSHA (PEL): TWA = 2 mg/m3 (respirable dust).

ACGIH (TLV): TWA = 2 mg/m3 (respirable fraction).

Chronic overexposure may cause damage to the liver, kidney, spleen, blood cells, bone marrow, eyes, respiratory system, heart, and gastrointestinal system.

This product contains C.I. Pigment Orange #5 which has been reported to be an invitro mutagen. The FDA has concluded that this pigment is an animal carcinogen by ingestion. Liver effects have also been observed in laboratory animal tests. There are no definitive findings linked to humans.

Chronic overexposure may cause allergic skin reactions, respiratory irritation, inflammation and asthma-like symptoms.

This product contains an organic pigment which is listed as a hazardous substance. If exposed to high temperatures or fire for an extended period of time, the product may smolder or burn giving off noxious fumes which can include oxides of nitrogen, carbon, and/or sulfur and other metallic oxides.

This product contains Iron Oxide, which is currently listed by OSHA & ACGIH as a fume hazard. Overexposure to dried particles may pose hazards to the eyes, ears & nose. Injury to the skin or mucous membranes can occur by rigorous skin cleaning or direct mechanical abrasion. Long term exposure to dust without respiratory protection may cause siderosis, a benign pneumoconiosis. Wet paint or paint overspray would not retain the hazardous properties of the dust particles.

This product contains C.I. Pigment Yellow #42 which is on the Pennsylvania Right-to-Know List. CAS# 20344-49-4

This product contains trace amounts of naturally occurring arsenic, chromium and nickel. These metals have not been added but are part of the pigment mineral ore. Potential exposure to the California Prop 65 chemicals in this pigment have been determined to be below the No Significant Risk Level (NSRL).

Exposure Limits For Iron Oxide (fume): (CAS# 1309-37-1) OSHA (PEL): TWA = 10 mg/m3 (as total particulates)

ACGIH (TLV): TWA = 5 mg/m3.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: Preexisting eye, skin, central nervous system, digestive tract, and respiratory tract. May adversely affect persons with liver, kidney & blood forming organ disorders.

ROUTE(S) OF ENTRY: Inhalation, skin contact absorption, eye contact. Products that are free-flowing liquids or pastes are not expected to have routes of exposure for dust. Dried product residue may exhibit dust inhalation hazards.

INHALATION: May cause slight to moderate respiratory tract irritation accompanied by congestion, headache, weakness, dizziness, drowsiness, and/or nausea. FIRST AID: Move person to fresh air. If breathing is

difficult, give oxygen. If not breathing, give artificial respiration and get immediate emergency medical assistance.

EYE CONTACT: Liquid, vapor or dust may cause moderate to severe irritation, redness, tearing, blurred vision & pain.

Proximal or chronic overexposure may cause eye damage. FIRST AID: Flush eyes with large amounts of water for at least 15 minutes. Hold eyelids apart to flush the entire contaminated area. Get medical help if irritation persists.

SKIN CONTACT: May cause moderate to severe skin irritation. May cause burning sensations, defatting and/or dermatitis.

Chronic overexposure may cause skin cracking and/or eczema. FIRST AID: Remove contaminated clothing and shoes. Wash area with soap and water. Get medical attention as needed.

SKIN ABSORPTION: May be absorbed through skin tissues. Chronic overexposure to the skin without using protective barriers (gloves, aprons, etc.) may cause toxic effects.

INGESTION: Single dose oral toxicity is low. May cause irritation to the gastrointestinal tract. Ingestion may cause nausea, discomfort, diarrhea, dizziness and vomiting. FIRST AID: DO NOT INDUCE VOMITING! Contents of this product pose an inhalation hazard. If aspirated into the lungs, may cause chemical pneumonitis and/or pulmonary edema which can be fatal. Never leave individual unattended, keep head low to prevent aspiration. SEEK IMMEDIATE MEDICAL ATTENTION!

SECTION VI - REACTIVITY DATA

STABILITY: ___ UNSTABLE __X STABLE

INCOMPATIBILITY (materials to avoid): Strong oxidizers. Strong acids.

HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of carbon/nitrogen, metal oxides and/or silicon dioxide fumes and other toxic or irritating vapors such as incompletely burned hydrocarbons, aldehydes, amines, HCN and/or sulfur oxides.

HAZARDOUS POLYMERIZATION: ___ May Occur __X Will Not Occur

CONDITIONS TO AVOID: Container is not a pressure vessel. Never use pressure to empty. Do not drag, puncture or drop container (prevent sparking). Dust particles from this product may pose a flammable or explosion hazard. Avoid dust accumulations. Containers should be grounded.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition (flames), electrical static or frictional sparks. Provide good ventilation to spill area. Dike spill area and add inert absorbent. Remove spilled material with non-sparking tools. Avoid breathing vapors and use respirator protective devices (SEE SECTION VIII). Only properly trained personnel should clean spilled hazards. Follow local, state and federal spill notification rules.

WASTE DISPOSAL: Consult licensed waste handling and/or transportation facility. Follow local, state, provincial and federal waste regulations. Do not incorporate into municipal sewage treatment facilities. Empty containers retain product residue, follow label and MSDS warnings even after container is emptied.

SECTION VIII - SAFE HANDLING & USE INFO

RESPIRATORY PROTECTION: In outdoor or open areas with unrestricted ventilation, use NIOSH approved dust mask to protect from overspray or solid airborne particulates. In restricted areas, use a NIOSH approved combination organic vapor and particulate respirator. Reference OSHA 1910.134 for specific guidelines. In confined areas use an airline respirator hood, supplied air respirator or self contained breathing apparatus. See OSHA 1910.146 for more details.

VENTILATION: Provide sufficient ventilation to keep hazards at levels below current ACGIH TLV and OSHA PEL of the most hazardous ingredient in SECTION II. Solvent vapors must be removed from the lower levels of work areas and all ignition sources eliminated. Remove decomposition products formed by welding or flame cutting coated surfaces. Dust and particle hazards are elevated during sanding, grinding, or surface preparation of previously coated surfaces.

SKIN PROTECTION REQUIREMENTS: Chemical resistant gloves are recommended. Use neoprene, nitrile, or butyl rubber. Cover as much of the exposed skin as possible with appropriate impervious clothing. If skin creams are used, keep the area protected by the cream to a minimum. Do not use skin creams to protect skin when working with acids or acid catalysts.

EYE PROTECTION: Eye protection should be worn in any type of industrial operation. The use of chemical goggles and a full face shield to prevent splash from liquids is recommended. Contact lenses should not be worn.

OTHER PROTECTIVE EQUIPMENT: Using a suit or apron to prevent contamination of clothing is recommended. Prevent prolonged skin contact with contaminated clothing. Remove and wash all contaminated clothing before re-use. Never wear contaminated clothes or shoes away from the workplace. Use an industrial type professional cleaning service, do not wash at home.

HYGIENIC PRACTICES: Emergency eye wash stations and safety showers are recommended. Wash hands prior to eating, using the washroom or smoking. Precautions must be taken so that persons handling this product do not breathe the vapors or have it contact the skin or eyes. In spray operations, protection must be afforded against exposure to both vapor and spray mist.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store large quantities in buildings designed and protected for storage of flammable liquids. Reference storage conditions in OSHA 1910.106. Avoid high temperature areas and open flames. Do not store above 120 F. Keep closures tight and container upright to avoid leakage.

OTHER PRECAUTIONS: Maintain a clean work area. Use only in a well ventilated area. **VHAP=VOLATILE HAZARDOUS AIR POLLUTANT**
CAUTION: DO NOT TAKE INTERNALLY. Avoid breathing vapor/dust.

WARNING! Sudden release of hot organic chemical vapors from equipment operating at elevated temperatures or sudden introduction to vacuum conditions may result in vapor ignition.

NOTICE: The HMIS rating for this material involves data and interpretations compiled from the various material suppliers of the component ingredients. This information will vary from supplier to supplier. The rating is intended for rapid and general identification of this product's hazards. To adequately deal with the safe handling of this material, all information contained in the MSDS must be reviewed as part of an ongoing Hazard Communication Program.

This product complies with the Toxic Substances Control Act (TSCA) 40 CFR 700-799. The Material Safety Data Sheet (MSDS) complies with 29 CFR 1910.1200, Hazardous Communication Std. In the event of a **TRANSPORTATION RELATED INCIDENT** involving this product, CALL 1-800-688-4005. VOC content is determined by EPA method 24.

WARNING! This product contains chemicals known to the State of California to cause cancer or reproductive harm.

SARA Title III: This product is regulated under Section 311- 312 (40CFR170): Immediate (Acute) Health Hazard, Delayed (Chronic) Health Hazard, Fire Hazard.

BLUE PAINT

PRODUCT SPECIFICATIONS

SHEBOYGAN PAINT COMPANY
1439 NORTH 25th STREET
P.O. BOX 417
SHEBOYGAN, WI 53082-0417
TELEPHONE (920) 458-2157

DATE OF PREPARATION 12/31/08
PRINTED DATE 03/18/09
TRANSPORTATION EMERGENCY (800) 688-4005

CUSTOMER SERVICE custserv@shebpaint.com

TRADE NAME
NEW FD BLUE H/S DIP

MFG. PRODUCT NO.
43-41491B

CUSTOMER :
PART NUMBER :
WEIGHT PER GALLON : 10.37 POUNDS
(density)
PERCENT SOLIDS : BY WEIGHT 68.40 BY VOLUME 54.48
PERCENT WATER :
PERCENT SOLVENT : 31.60 45.52
% EXEMPT SOLVENT :
VOC (WITH WATER AND EXEMPT SOLV) : 3.28 LBS/GAL 393.07 GMS/LITER
VOC (LESS WATER AND EXEMPT SOLV) : 3.28 LBS/GAL 393.07 GMS/LITER
PERCENT HAPS BY WEIGHT : .84
VOC LBS PER GALLON SOLIDS : 6.02
VOC KILOGRMS PER KILOGRMS SOLIDS : .46
VOC HAPS LBS PER GALLON SOLIDS : .16
VOC HAPS LBS PER LBS SOLIDS : .01
FLASHPOINT (FAHRENHEIT) : 102 F (ASTM D3828)
APPLICATION : DIP
REDUCTION : NONE
CURE : AIR DRY
SUBSTRATE : STEEL
COVERAGE : 873.859 SQUARE FEET @ 1 MIL NO LOSS
VISC @ 80 F : 20-26/3 ZAHN
CRYPTOMETER : 8-15#7 WEDGE
GLOSS : 85-95 OVERNIGHT DRY NO ADJ

COMMENTS

UNUSUAL FIRE & EXPLOSION HAZARDS: Handling dry materials or dust created from this product may pose an explosion hazard. Use explosion proof equipment. Avoid dust accumulations. Always electrically bond/ground processing equipment. Use good housekeeping practices to keep dust to a minimum. Smoke from burning product may be toxic. Spilled product, residue, or dust may burn fiercely if ignited. Runoff firefighting water may contain toxic or acidic materials.

SPECIAL FIRE FIGHTING PROCEDURES: Water spray may be ineffective. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition when exposed to extreme heat. Water fog nozzle settings are preferable. A self-contained positive pressure breathing apparatus with full-face piece should be worn in addition to full firefighting safety equipment. Keep unnecessary people away, isolate hazards, stay upwind, keep out of low areas.

SECTION V - HEALTH HAZARD

EFFECTS OF OVEREXPOSURE: Irritation of the respiratory tract or acute nervous system depression characterized by headache, dizziness, staggered gait, confusion, unconsciousness, coma. There is no applicable information available regarding the carcinogen potential for this product as a whole, however any relevant information regarding any ingredient's status as a potential, suspect, or confirmed carcinogen is listed in SECTION V of the MSDS.

Chronic overexposure may damage the liver and/or kidneys, blood cells, cause cardiac sensations, hearing effects, and/or cause birth or fertility defects in lab animals.

Repeated and prolonged exposure to some solvents has been associated with permanent brain and nervous system damage.

Intentional misuse by deliberately concentrating & inhaling vapors from this product may be harmful or fatal.

Exposure limits for n-Butanol: (CAS# 71-36-3 Butyl Alcohol) ACGIH(TLV): Ceiling = 50 ppm or 152 mg/m³.

This product contains 1,2,4-trimethylbenzene which is on the New Jersey and Pennsylvania Right-to-Know lists. (Pseudocumene) CAS #96-63-3

This product contains aromatic naphtha, light which is on the Pennsylvania Right-to-Know list. CAS# 64742-95-6

This product contains n-Butyl Alcohol which is on the Pennsylvania & New Jersey Right-to-Know Lists.

Chemical Name: 1-Butanol CAS# 71-36-3

This product contains Titanium Dioxide, which is currently listed by OSHA and ACGIH as a nuisance dust hazard.

Exposure Limits for Titanium Dioxide(dust): OSHA (PEL): TWA =15 mg/m³ (total dust) 5mg/m³ (respirable)

ACGIH(TLV): TWA =10 mg/m³ (total dust).

Prolonged and continuous exposure to excessive concentration of dust of any kind without using a dust mask may have an adverse pulmonary effect on some people. This overexposure may result in coughing, sputum, and reduced lung capacity.

Pre-existing asthmatic conditions may worsen. Persons with lung diseases should not work in dusty areas unless a physician certifies their fitness to wear a respirator. (OSHA 1910.134). Liquid paint does not readily release dust.

Exposure Limits For Inert and Nuisance Dust Particulates Not Otherwise Classified: OSHA (PEL): TWA =15 mg/m³ (total dust) 5 mg/m³ (respirable fraction). ACGIH(TLV): TWA = 10 mg/m³ (total dust).

This product contains Talc (containing no asbestos) which is currently listed by OSHA & ACGIH as a nuisance dust hazard.

Prolonged exposure to dried talc particles can result in scarring of the lungs (talcosis) or of the covering of the lungs (pleural thickening). Excessive exposure to any dust may aggravate pre-existing respiratory conditions. Wet paint and paint overspray does not retain the hazardous properties of the dust particles.

Exposure Limits For Talc (containing no asbestos fibers): OSHA (PEL): TWA = 2 mg/m³ (respirable dust).

ACGIH(TLV): TWA = 2 mg/m³ (respirable fraction).

This product contains Barium Sulfate which is listed by OSHA and ACGIH as a nuisance dust. Long term overexposure to barium sulfate dust may produce benign Pneumoconiosis termed "baritosis" and may reduce lung functions.

Exposure Limits For Barium Sulfate: (CAS# 7727-43-7) OSHA (PEL): TWA =10 mg/m³ (total dust), 5 mg/m³ (respirable)

ACGIH(TLV): TWA =10 mg/m³ (total dust).

This product contains Barium Sulfate which is on the New Jersey, Massachusetts or Pennsylvania Right-to-Know Lists. CAS #7727-43-7

This product contains 1,3,5-trimethylbenzene which is on the New Jersey Right-to-Know List. CAS# 108-67-8

This product contains a copper compound. Pigment Blue 15 CAS# 147-14-8; Pigment Green 7 CAS# 1328-53-6; and Pigment Green 36 CAS# 14302-13-7 ARE ALL EXEMPT FROM REPORTING REQUIREMENTS UNDER THE CATEGORY "COPPER COMPOUNDS" from the list of toxic chemicals under section 313, EPCRA. These pigments contain up to 10% elemental copper by weight, CAS# 7440-50-8 which is on the SARA 313 list of chemicals.

This product contains C.I. Pigment Blue #15 which is on the Pennsylvania, MASS & NJ Right-to-Know List. CHEMICAL

Name: Copper, [29]1,3[H-phthalocyaniato(2-)-N29,N30,N31,N32]- (SF-4-1)- CAS# 147-14-8

Chronic overexposure may cause skin sensitization.

This product contains Zirconium Compounds which are listed by OSHA and ACGIH as a metal fume and/or dust hazard.

Exposure Limits For Zirconium Compounds: OSHA (PEL): TWA = 5 mg/m³. ACGIH (TLV): TWA = 5 mg/m³, (TLV): STEL = 10 mg/m³.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: Preexisting eye, skin, central nervous system, digestive tract, and respiratory tract. May adversely affect persons with liver, kidney & blood forming organ disorders.

ROUTE(S) OF ENTRY: Inhalation, skin contact absorption, eye contact. Products that are free-flowing liquids or pastes are not expected to have routes of exposure for dust. Dried product residue may exhibit dust inhalation hazards.

INHALATION: May cause slight to moderate respiratory tract irritation accompanied by congestion, headache, weakness, dizziness, drowsiness, and/or nausea. **FIRST AID:** Move person to fresh air. If breathing is difficult, give oxygen. If not breathing, give artificial respiration and get immediate emergency medical assistance.

EYE CONTACT: Liquid, vapor or dust may cause moderate to severe irritation, redness, tearing, blurred vision & pain. Prolonged or chronic overexposure may cause eye damage. **FIRST AID:** Flush eyes with large amounts of water for at least 15 minutes. Hold eyelids apart to flush the entire contaminated area. Get medical help if irritation persists.

SKIN CONTACT: May cause moderate to severe skin irritation. May cause burning sensations, defatting and/or dermatitis. Chronic overexposure may cause skin cracking and/or eczema. **FIRST AID:** Remove contaminated clothing and shoes. Wash area with soap and water. Get medical attention as needed.

SKIN ABSORPTION: May be absorbed through skin tissues. Chronic overexposure to the skin without using protective barriers (gloves, aprons, etc.) may cause toxic effects.

INGESTION: Single dose oral toxicity is low. May cause irritation to the gastrointestinal tract. Ingestion may cause nausea, discomfort, diarrhea, dizziness and vomiting. **FIRST AID:** DO NOT INDUCE VOMITING! Contents of this product pose an inhalation hazard. If aspirated into the lungs, may cause chemical pneumonitis and/or pulmonary edema which can be fatal. Never leave individual unattended, keep head low to prevent aspiration. SEEK IMMEDIATE MEDICAL ATTENTION!

SECTION VI - REACTIVITY DATA

STABILITY: ____UNSTABLE __X__STABLE

INCOMPATIBILITY (materials to avoid): Strong oxidizers. Strong acids.

HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of carbon/nitrogen, metal oxides and/or silicon dioxide fumes and other toxic or irritating vapors such as incompletely burned hydrocarbons, aldehydes, amines, HCN and/or sulfur oxides.

HAZARDOUS POLYMERIZATION: ____May Occur __X__Will Not Occur

CONDITIONS TO AVOID: Container is not a pressure vessel. Never use pressure to empty. Do not drag, puncture or drop container (prevent sparking). Dust particles from this product may pose a flammable or explosion hazard. Avoid dust accumulations. Containers should be grounded.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition (flames), electrical static or frictional sparks. Provide good ventilation to spill area. Dike spill area and add inert absorbent. Remove spilled material with non-sparking tools. Avoid breathing vapors and use respirator protective devices (SEE SECTION VIII). Only properly trained personnel should clean spilled hazards. Follow local, state and federal spill notification rules.

WASTE DISPOSAL: Consult licensed waste handling and/or transportation facility. Follow local, state, provincial and federal waste regulations. Do not incorporate into municipal sewage treatment facilities. Empty containers retain product residue, follow label and MSDS warnings even after container is emptied.

SECTION VIII - SAFE HANDLING & USE INFO

RESPIRATORY PROTECTION: In outdoor or open areas with unrestricted ventilation, use NIOSH approved dust mask to protect from overspray or solid airborne particulates. In restricted areas, use a NIOSH approved combination organic vapor and particulate respirator. Reference OSHA 1910.134 for specific guidelines. In confined areas use an airline respirator hood, supplied air respirator or self contained breathing apparatus. See OSHA 1910.146 for more details.

VENTILATION: Provide sufficient ventilation to keep hazards at levels below current ACGIH TLV and OSHA PEL of the most hazardous ingredient in SECTION II. Solvent vapors must be removed from the lower levels of work areas and all ignition sources eliminated. Remove decomposition products formed by welding or flame cutting coated surfaces. Dust and particle hazards are elevated during sanding, grinding, or surface preparation of previously coated surfaces.

SKIN PROTECTION REQUIREMENTS: Chemical resistant gloves are recommended. Use neoprene, nitrile, or butyl rubber. Cover as much of the exposed skin as possible with appropriate impervious clothing. If skin creams are used, keep the area protected by the cream to a minimum. Do not use skin creams to protect skin when working with acids or acid catalysts.

EYE PROTECTION: Eye protection should be worn in any type of industrial operation. The use of chemical goggles and a full face shield to prevent splash from liquids is recommended. Contact lenses should not be worn.

OTHER PROTECTIVE EQUIPMENT: Using a suit or apron to prevent contamination of clothing is recommended. Prevent prolonged skin contact with contaminated clothing. Remove and wash all contaminated clothing before re-use. Never wear contaminated clothes or shoes away from the workplace. Use an industrial type professional cleaning service, do not wash at home.

HYGIENIC PRACTICES: Emergency eye wash stations and safety showers are recommended. Wash hands prior to eating, using the washroom or smoking. Precautions must be taken so that persons handling this product do not breathe the vapors or have it contact the skin or eyes. In spray operations, protection must be afforded against exposure to both vapor and spray mist.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store large quantities in buildings designed and protected for storage of flammable liquids. Reference storage conditions in OSHA 1910.106. Avoid high temperature areas and open flames. Do not store above 120 F. Keep closures tight and container upright to avoid leakage.

OTHER PRECAUTIONS: Maintain a clean work area. Use only in a well ventilated area. VHAP=VOLATILE HAZARDOUS AIR POLLUTANT
CAUTION! DO NOT TAKE INTERNALLY. Avoid breathing vapor/dust.

NOTICE: The HMIS rating for this material involves data and interpretations compiled from the various material suppliers of the component ingredients. This information will vary from supplier to supplier. The rating is intended for rapid and general identification of this product's hazards. To adequately deal with the safe handling of this material, all information contained in the MSDS must be reviewed as part of an ongoing Hazard Communication Program.

This product complies with the Toxic Substances Control Act (TSCA) 40 CFR 700-799. The Material Safety Data Sheet (MSDS) complies with 29 CFR 1910.1200, Hazardous Communication Std. In the event of a TRANSPORTATION RELATED INCIDENT involving this product, CALL 1-800-688-4005. VOC content is determined by EPA method 24.

WARNING! Sudden release of hot organic chemical vapors from equipment operating at elevated temperatures or sudden introduction to vacuum conditions may result in vapor ignition.

SARA Title III: This product is regulated under Section 311- 312 (40CFR370): Immediate (Acute) Health Hazard, Delayed (Chronic) Health Hazard, Fire Hazard.

WARNING! This product contains chemicals known to the State of California to cause cancer or reproductive harm.

YELLOW PAINT

PRODUCT SPECIFICATIONS

SHEBOYGAN PAINT COMPANY
1439 NORTH 25th STREET
P.O. BOX 417
SHEBOYGAN, WI 53082-0417
TELEPHONE (920) 458-2157

DATE OF PREPARATION 04/29/09
PRINTED DATE 05/07/09
TRANSPORTATION EMERGENCY (800) 688-4005

CUSTOMER SERVICE custserv@shebpaint.com

TRADE NAME
X-9228 MDI YELLOW UV GUARD
HI-SOLIDS ENAMEL

MFG. PRODUCT NO.
43-62028

CUSTOMER :
PART NUMBER :
WEIGHT PER GALLON :
(density)

10.45 POUNDS

PERCENT SOLIDS

BY WEIGHT 74.09 BY VOLUME 61.90

PERCENT WATER

PERCENT SOLVENT

25.91 38.10

% EXEMPT SOLVENT

VOC (WITH WATER AND EXEMPT SOLV) : 2.71 LBS/GAL 324.76 GMS/LITER

VOC (LESS WATER AND EXEMPT SOLV) : 2.71 LBS/GAL 324.76 GMS/LITER

PERCENT HAPS BY WEIGHT : 1.37
VOC LBS PER GALLON SOLIDS : 4.38
VOC KILOGRMS PER KILOGRMS SOLIDS : .35
VOC HAPS LBS PER GALLON SOLIDS : .23
VOC HAPS LBS PER LBS SOLIDS : .02

FLASHPOINT (FAHRENHEIT) : 102 (ASTM D3828)

APPLICATION : DIP

REDUCTION : NONE

CURE : AIR DRY

SUBSTRATE : STEEL

COVERAGE : 992.876 SQUARE FEET @ 1 MIL NO LOSS

VISC @ 80 F : 26-30#3 ZAHN, 26#3 MINIMUM

GLOSS : 80-90@1 MIL

SAG CHECK : 7-20 7 MINIMUM

COMMENTS

SECTION IV - FIRE & EXPLOSION HAZARDS

PROPER SHIPPING NAME - PAINT, 3, UN1263, III

(FLASH POINT > 100 DEGREES)

SHIPPING LABEL - NOT REGULATED IF QTY. LESS THAN 119 GALLONS

FLASHPOINT 102 (ASTM D3828)

EXTINGUISHING MEDIA: Use carbon dioxide or dry chemical for small fires. For large fires, use an alcohol-type or multi-purpose foam extinguishing agent. Water may be ineffective to extinguish fires involving this type of product.

UNUSUAL FIRE & EXPLOSION HAZARDS: Keep containers tightly closed, isolate from heat, open electrical equipment, sparks and open flames. Used containers may explode when exposed to high heat. DANGER! Rags, steel wool, or waste soaked with product may spontaneously catch fire if improperly discarded or stored. Immediately after use, place rags or waste in a sealed water-filled metal container.

SPECIAL FIRE FIGHTING PROCEDURES: Water may be used to cool closed containers to prevent pressure buildup. Keep people away from any fire fighting operations involving chemicals. Wear a self-contained positive pressure breathing apparatus in addition to full protective gear.

SECTION V - HEALTH HAZARD

EFFECTS OF OVEREXPOSURE: Irritation of the respiratory tract or acute nervous system depression characterized by headache, dizziness, staggered gait, confusion, unconsciousness, coma. There is no applicable information available regarding the carcinogen potential for this product as a whole, however any relevant information regarding any ingredient's status as a potential, suspect, or confirmed carcinogen is listed in SECTION V of the MSDS.

Chronic overexposure may damage the liver and/or kidneys, blood cells, cause cardiac sensations, hearing effects, and/or cause birth or fertility defects in lab animals.

Repeated and prolonged exposure to some solvents has been associated with permanent brain and nervous system damage.

Intentional misuse by deliberately concentrating & inhaling vapors from this product may be harmful or fatal.

This product contains aromatic naphtha, light which is on the Pennsylvania Right-to-Know list. CAS# 64742-95-6

Ingestion of alcohol can increase the effects of overexposure from some solvents in this product.

Exposure to XYLENE can affect the cardiovascular, pulmonary, CNS, and gastrointestinal systems. Liver enzymes, serum electrolytes, EKG and chest X-ray should be done in cases of massive exposure to xylene.

ETHYLBENZENE (CAS# 100-41-4) is present in this product. Ethylbenzene has been classified by IARC as a possible human carcinogen group 2B. * Ethylbenzene is a potential chronic health hazard and is on the New Jersey Right-to-Know list.

This product contains xylenes, mixed isomers which is on the New Jersey and Pennsylvania Right-to-Know Lists.

(benzene, dimethyl-) CAS# 1330-20-7

This product contains 1,2,4-trimethylbenzene which is on the New Jersey and Pennsylvania Right-to-Know lists.

(Pseudocumene) CAS #96-63-3

This product contains 1,3,5-trimethylbenzene which is on the New Jersey Right-to-Know List. CAS# 108-67-8

Prolonged and continuous exposure to excessive concentration of dust of any kind without using a dust mask may have an adverse pulmonary effect on some people. This overexposure may result in coughing, sputum, and reduced lung capacity.

Pre-existing asthmatic conditions may worsen. Persons with lung diseases should not work in dusty areas unless a physician certifies their fitness to wear a respirator. (OSHA 1910.134). Liquid paint does not readily release dust.

Exposure Limits For Inert and Nuisance Dust Particulates Not Otherwise Classified: OSHA (PEL): TWA =15 mg/m³ (total dust) 5 mg/m³ (respirable fraction). ACGIH(TLV): TWA = 10 mg/m³ (total dust).

This product contains stoddard solvent which is on the New Jersey and Pennsylvania Right-to-Know Lists. CAS# 8052-41-3

This product contains Titanium Dioxide, which is currently listed by OSHA and ACGIH as a nuisance dust hazard.

Exposure Limits for Titanium Dioxide(dust): OSHA (PEL): TWA =15 mg/m³ (total dust) 5mg/m³ (respirable)

ACGIH(TLV): TWA =10 mg/m³ (total dust).

This product contains Barium Sulfate which is listed by OSHA and ACGIH as a nuisance dust. Long term overexposure to barium sulfate dust may produce benign Pneumoconiosis termed "baritosis" and may reduce lung functions.

Exposure Limits For Barium Sulfate: (CAS# 7727-43-7) OSHA (PEL): TWA =10 mg/m³ (total dust), 5 mg/m³ (respirable)

ACGIH(TLV): TWA =10 mg/m³ (total dust).

This product contains Barium Sulfate which is on the New Jersey, Massachusetts or Pennsylvania Right-to-Know Lists.

CAS #7727-43-7

This product contains Talc (containing no asbestos) which is currently listed by OSHA & ACGIH as a nuisance dust hazard.

Prolonged exposure to dried talc particles can result in scarring of the lungs (talcosis) or of the covering of the lungs (pleural thickening). Excessive exposure to any dust may aggravate pre-existing respiratory conditions. Wet paint and paint overspray does not retain the hazardous properties of the dust particles.

Exposure Limits For Talc (containing no asbestos fibers): OSHA (PEL): TWA = 2 mg/m³ (respirable dust).

ACGIH(TLV): TWA = 2 mg/m³ (respirable fraction).

Chronic overexposure may cause damage to the liver, kidney, blood cells, bone marrow, and respiratory system.

Exposure limits for n-Butanol: (CAS# 71-36-3 Butyl Alcohol) ACGIH(TLV): Ceiling = 50 ppm or 152 mg/m³.

This product contains n-Butyl Alcohol which is on the Pennsylvania & New Jersey Right-to-Know Lists.

Chemical Name: 1-Butanol CAS# 71-36-3

This product contains C.I. Pigment Yellow #74 which is on the Pennsylvania Right-to-Know List. CHEMICAL NAME:

Butanamide, 2-[(2-methoxy-4-nitrophenyl)azo]-N-(2-methoxy-phenyl)-3-oxo- CAS# 6358-31-2

This product contains an organic pigment which is listed as a hazardous substance. If exposed to high temperatures or fire for an extended period of time, the product may smolder or burn giving off noxious fumes which can include oxides of nitrogen, carbon, and/or sulfur and other metallic oxides.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: Preexisting eye, skin, central nervous system, digestive tract, and respiratory tract. May adversely affect persons with liver, kidney & blood forming organ disorders.

ROUTE(S) OF ENTRY: Inhalation, skin contact absorption, eye contact. Products that are free-flowing liquids or pastes are not expected to have routes of exposure for dust. Dried product residue may exhibit dust inhalation hazards.

INHALATION: May cause slight to moderate respiratory tract irritation accompanied by congestion, headache, weakness, dizziness, drowsiness, and/or nausea. FIRST AID: Move person to fresh air. If breathing is difficult, give oxygen. If not breathing, give artificial respiration and get immediate emergency medical assistance.

EYE CONTACT: Liquid, vapor or dust may cause moderate to severe irritation, redness, tearing, blurred vision & pain. Prolonged or chronic overexposure may cause eye damage. FIRST AID: Flush eyes with large amounts of water for at least 15 minutes. Hold eyelids apart to flush the entire contaminated area. Get medical help if irritation persists.

SKIN CONTACT: May cause moderate to severe skin irritation. May cause burning sensations, defatting and/or dermatitis. Chronic overexposure may cause skin cracking and/or eczema. FIRST AID: Remove contaminated clothing and shoes. Wash area with soap and water. Get medical attention as needed.

SKIN ABSORPTION: May be absorbed through skin tissues. Chronic overexposure to the skin without using protective barriers (gloves, aprons, etc.) may cause toxic effects.

INGESTION: Single dose oral toxicity is low. May cause irritation to the gastrointestinal tract. Ingestion may cause nausea, discomfort, diarrhea, dizziness and vomiting. FIRST AID: DO NOT INDUCE VOMITING! Contents of this product pose an inhalation hazard. If aspirated into the lungs, may cause chemical pneumonitis and/or pulmonary edema which can be fatal. Never leave individual unattended, keep head low to prevent aspiration. SEEK IMMEDIATE MEDICAL ATTENTION!

SECTION VI - REACTIVITY DATA

STABILITY: _____UNSTABLE ___XX_STABLE

INCOMPATIBILITY(materials to avoid): Strong oxidizers. Strong acids.

HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of carbon, nitrogen and/or sulfur & other toxic gases and irritating vapors like aldehydes, amines, HCN, and incompletely burned hydrocarbons.

HAZARDOUS POLYMERIZATION: ___May Occur ___XX Will Not Occur

CONDITIONS TO AVOID: Container is not a pressure vessel. Never use pressure to empty. Do not drag, puncture or drop container (prevent sparking). Dust particles from this product may pose a flammable or explosion hazard. Avoid dust accumulations. Containers should be grounded.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Remove all sources of ignition(flames), electrical static or frictional sparks. Provide good ventilation to spill area. Dike spill area and add inert absorbent. Remove spilled material with non-sparking tools. Avoid breathing vapors and use respirator protective devices (SEE SECTION VIII). Only properly trained personnel should clean spilled hazards. Follow local, state and federal spill notification rules.

WASTE DISPOSAL: Consult licensed waste handling and/or transportation facility. Follow local, state, provincial and federal waste regulations. Do not incorporate into municipal sewage treatment facilities. Empty containers retain product residue, follow label and MSDS warnings even after container is emptied.

SECTION VIII - SAFE HANDLING & USE INFO

RESPIRATORY PROTECTION: In outdoor or open areas with unrestricted ventilation, use NIOSH approved dust mask to protect from overspray or solid airborne particulates. In restricted areas, use a NIOSH approved combination organic vapor and particulate respirator. Reference OSHA 1910.134 for specific guidelines. In confined areas use an airline respirator hood, supplied air respirator or self contained breathing apparatus. See OSHA 1910.146 for more details.

VENTILATION: Provide sufficient ventilation to keep hazards at levels below current ACGIH TLV and OSHA PEL of the most hazardous ingredient in SECTION II. Solvent vapors must be removed from the lower levels of work areas and all ignition sources eliminated. Remove decomposition products formed by welding or flame cutting coated surfaces. Dust and particle hazards are elevated during sanding, grinding, or surface preparation of previously coated surfaces.

SKIN PROTECTION REQUIREMENTS: Chemical resistant gloves are recommended. Use neoprene, nitrile, or butyl rubber. Cover as much of the exposed skin as possible with appropriate impervious clothing. If skin creams are used, keep the area protected by the cream to a minimum. Do not use skin creams to protect skin when working with acids or acid catalysts.

EYE PROTECTION: Eye protection should be worn in any type of industrial operation. The use of chemical goggles and a full face shield to prevent splash from liquids is recommended. Contact lenses should not be worn.

OTHER PROTECTIVE EQUIPMENT: Using a suit or apron to prevent contamination of clothing is recommended. Prevent prolonged skin contact with contaminated clothing. Remove and wash all contaminated clothing before re-use. Never wear contaminated clothes or shoes away from the workplace. Use an industrial type professional cleaning service, do not wash at home.

HYGIENIC PRACTICES: Emergency eye wash stations and safety showers are recommended. Wash hands prior to eating, using the washroom or smoking. Precautions must be taken so that persons handling this product do not breathe the vapors or have it contact the skin or eyes. In spray operations, protection must be afforded against exposure to both vapor and spray mist.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store large quantities in buildings designed and protected for storage of flammable liquids. Reference storage conditions in OSHA 1910.106. Avoid high temperature areas and open flames. Do not store above 120 F. Keep closures tight and container upright to avoid leakage.

OTHER PRECAUTIONS: Maintain a clean work area. Use only in a well ventilated area. VHAP=VOLATILE HAZARDOUS AIR POLLUTANT CAUTION! DO NOT TAKE INTERNALLY. Avoid breathing vapor/dust.

WARNING! Sudden release of hot organic chemical vapors from equipment operating at elevated temperatures or sudden introduction to vacuum conditions may result in vapor ignition.

NOTICE: The HMIS rating for this material involves data and interpretations compiled from the various material suppliers of the component ingredients. This information will vary from supplier to supplier. The rating is intended for rapid and general identification of this product's hazards. To adequately deal with the safe handling of this material, all information contained in the MSDS must be reviewed as part of an ongoing Hazard Communication Program.

This product complies with the Toxic Substances Control Act (TSCA) 40 CFR 700-799. The Material Safety Data Sheet (MSDS) complies with 29 CFR 1910.1200, Hazardous Communication Std. In the event of a TRANSPORTATION RELATED INCIDENT involving this product, CALL 1-800-688-4005. VOC content is determined by EPA method 24.

WARNING! This product contains chemicals known to the State of California to cause cancer or reproductive harm.

SARA Title III: This product is regulated under Section 311- 312 (40CFR370): Immediate (Acute) Health Hazard, Delayed (Chronic) Health Hazard, Fire Hazard.

REGULATORY INFORMATION: This product contains a Marine Pollutant. Do not allow this product to be spilled into or near watersheds or bodies of water.

CAUTION! Maintain a clean work area, remove rags and wastes daily. Store waste and used-rags in approved containers.

AROMATIC 100

The Version Date and Number for this MSDS is : 12/10/2007 - #012

PRODUCT NAME: AROMATIC 100
MSDS NUMBER: EQ940652
DATE ISSUED: 10/04/2007
SUPERSEDES: 05/23/2006
ISSUED BY: 008505

MATERIAL SAFETY DATA SHEET

SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

PRODUCT

Product Name: AROMATIC 100; SOLVENT 100
Product Description: Aromatic Hydrocarbon
Intended Use: Solvent

Distributed by:
Univar USA Inc.
17425 NE Union Hill Road
Redmond, WA 98052
425-889-3400

Transportation Emergency Phone (800) 424-9300 or
(703) 527-3887 CHEMTREC

SECTION 2 COMPOSITION/INFORMATION ON INGREDIENTS

Reportable Hazardous Substance(s) or Complex Substance(s)

Name	CAS#	Concentration*
SOLVENT NAPHTHA (PETROLEUM), LIGHT AROMATIC	64742-95-6	100%

Hazardous Constituent(s) Contained in Complex Substance(s)

Name	CAS#	Concentration*
CUMENE	98-82-8	< 1.1%
PSEUDOCUMENE (1,2,4-TRIMETHYLBENZENE)	95-63-6	< 32.0%
XYLENES	1330-20-7	< 2.2%

* All concentrations are percent by weight unless material is a gas.
Gas concentrations are in percent by volume.

SECTION 3 HAZARDS IDENTIFICATION

This material is considered to be hazardous according to regulatory guidelines (see (M)SDS Section 15).

POTENTIAL PHYSICAL/CHEMICAL EFFECTS

Combustible. Material can release vapors that readily form flammable mixtures. Vapor accumulation could flash and/or explode if ignited. Material can accumulate static charges which may cause an incendiary electrical discharge.

POTENTIAL HEALTH EFFECTS

Repeated exposure may cause skin dryness or cracking. If swallowed, may be aspirated and cause lung damage. May be irritating to the eyes, nose, throat, and lungs. May cause central nervous system depression.

ENVIRONMENTAL HAZARDS

Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.

NFPA Hazard ID:	Health: 1	Flammability: 2	Reactivity: 0
HMS Hazard ID:	Health: 1	Flammability: 2	Reactivity: 0

NOTE: This material should not be used for any other purpose than the intended use in Section 1 without expert advice. Health studies have shown that chemical exposure may cause potential human health risks which may vary from person to person.

SECTION 4 FIRST AID MEASURES

INHALATION

Remove from further exposure. For those providing assistance, avoid exposure to yourself or others. Use adequate respiratory protection. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or use mouth-to-mouth resuscitation.

SKIN CONTACT

Wash contact areas with soap and water. Remove contaminated clothing. Launder contaminated clothing before reuse.

EYE CONTACT

Flush thoroughly with water. If irritation occurs, get medical assistance.

INGESTION

Seek immediate medical attention. Do not induce vomiting.

NOTE TO PHYSICIAN

If ingested, material may be aspirated into the lungs and cause chemical pneumonitis. Treat appropriately.

SECTION 5 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA

Appropriate Extinguishing Media: Use water fog, foam, dry chemical or carbon dioxide (CO₂) to extinguish flames.

Inappropriate Extinguishing Media: Straight Streams of Water

FIRE FIGHTING

Fire Fighting Instructions: Evacuate area. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply. Firefighters should use standard protective equipment and in enclosed spaces, self-contained breathing apparatus (SCBA). Use water spray to cool fire exposed surfaces and to protect personnel.

Unusual Fire Hazards: Vapors are flammable and heavier than air. Vapors may travel across the ground and reach remote ignition sources causing a flashback fire danger. Hazardous material. Firefighters should consider protective equipment indicated in Section 8.

Hazardous Combustion Products: Oxides of carbon, Incomplete combustion products, Smoke, Fume

FLAMMABILITY PROPERTIES

Flash Point (Method): >42C (108F) (ASTM D-56)

Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 6.2

Autoignition Temperature: 479 C (894 F)

SECTION 6 ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES

In the event of a spill or accidental release, notify relevant authorities in accordance with all applicable regulations. In the event of a spill or accidental release, notify relevant authorities in accordance with all applicable regulations. US regulations require reporting releases of this material to the environment which exceed the applicable reportable quantity or oil spills which could reach any waterway including intermittent dry creeks. The National Response Center can be reached at (800)424-8802.

PROTECTIVE MEASURES

Avoid contact with spilled material. Warn or evacuate occupants in surrounding and downwind areas if required due to toxicity or flammability of the material. See Section 5 for fire fighting information. See the Hazard Identification Section for Significant Hazards. See Section 4 for First Aid Advice. See Section 8 for Personal Protective Equipment.

SPILL MANAGEMENT

Land Spill: Eliminate all ignition sources (no smoking, flares, sparks or flames in immediate area). Stop leak if you can do it without risk. All equipment used when handling the product must be grounded. Do not touch or walk through spilled material. Prevent entry into waterways, sewer, basements or confined areas. A vapor suppressing foam may be used to reduce vapors. Use

Annotation:

clean non-sparking tools to collect absorbed material. Absorb or cover with dry earth, sand or other non-combustible material and transfer to containers. Large Spills: Water spray may reduce vapor; but may not prevent ignition in closed spaces. Recover by pumping or with suitable absorbent.

Water Spill: Stop leak if you can do it without risk. Eliminate sources of ignition. Warn other shipping. If the Flash Point exceeds the Ambient Temperature by 10 degrees C or more, use containment booms and remove from the surface by skimming or with suitable absorbents when conditions permit. If the Flash Point does not exceed the Ambient Air Temperature by at least 10C, use booms as a barrier to protect shorelines and allow material to evaporate. Seek the advice of a specialist before using dispersants.

Water spill and land spill recommendations are based on the most likely spill scenario for this material; however, geographic conditions, wind, temperature, (and in the case of a water spill) wave and current direction and speed may greatly influence the appropriate action to be taken. For this reason, local experts should be consulted. Note: Local regulations may prescribe or limit action to be taken.

ENVIRONMENTAL PRECAUTIONS

Large Spills: Dike far ahead of liquid spill for later recovery and disposal. Prevent entry into waterways, sewers, basements or confined areas.

SECTION 7 HANDLING AND STORAGE

HANDLING

Avoid contact with skin. Potentially toxic/irritating fumes/vapors may be evolved from heated or agitated material. Use only with adequate ventilation. Use proper bonding and/or grounding procedures. Prevent small spills and leakage to avoid slip hazard. Material can accumulate static charges which may cause an electrical spark (ignition source).

Loading/Unloading Temperature: (Ambient)

Transport Temperature: (Ambient)

Transport Pressure: (Ambient)

Static Accumulator: This material is a static accumulator.

STORAGE

Keep container closed. Handle containers with care. Open slowly in order to control possible pressure release. Store in a cool, well-ventilated area. Storage containers should be grounded and bonded. Drums must be grounded and bonded and equipped with self-closing valves, pressure vacuum bungs and flame arresters.

Storage Temperature: (Ambient)

Storage Pressure: (Ambient)

Suitable Containers/Packing: Railcars; Tank Trucks; Barges; Drums; Tankers

Annotation:

Suitable Materials and Coatings: Carbon Steel; Stainless Steel; Copper
Bronze; Inorganic Zinc Coatings; Epoxy Phenolic; Polyamide Epoxy; Amine
Epoxy; Viton

Unsuitable Materials and Coatings: Vinyl Coatings; Butyl Rubber; Natural
Rubber; Ethylene-propylene-diene monomer (EPDM); Polyethylene; Polystyrene;
Polypropylene; PVC; Polyacrylonitrile

SECTION 8 EXPOSURE CONTROLS/PERSONAL PROTECTION

EXPOSURE LIMIT VALUES

Exposure limits/standards (Note: Exposure limits are not additive)

Source	Form	Limit/Standard	Note	Source
CUMENE	TWA	245 mg/m3 50 ppm	Skin	OSHA Z1
CUMENE	TWA	50 ppm	N/A	ACGIH
PSEUDOCUMENE (1,2,4-TRIMETHYLBENZENE)	TWA	25 ppm	N/A	ACGIH
SOLVENT NAPHTHA (PETROLEUM), Vapor.	RCP	19 ppm 100	Total	ExxonMobil
LIGHT AROMATIC	TWA	mg/m3	Hydro- carbons	
XYLENES	TWA	435 mg/m3 100 ppm	N/A	OSHA Z1
XYLENES	STEL	150 ppm	N/A	ACGIH
XYLENES	TWA	100 ppm	N/A	ACGIH

NOTE: Limits/standards shown for guidance only. Follow applicable
regulations.

ENGINEERING CONTROLS

The level of protection and types of controls necessary will vary depending
upon potential exposure conditions. Control measures to consider:

Adequate ventilation should be provided so that exposure limits are not
exceeded. Use explosion-proof ventilation equipment.

PERSONAL PROTECTION

Personal protective equipment selections vary based on potential exposure
conditions such as applications, handling practices, concentration and
ventilation. Information on the selection of protective equipment for use
with this material, as provided below, is based upon intended, normal usage.

Respiratory Protection: If engineering controls do not maintain airborne
contaminant concentrations at a level which is adequate to protect worker
health, an approved respirator may be appropriate. Respirator selection,
use, and maintenance must be in accordance with regulatory requirements, if
applicable. Types of respirators to be considered for this material include:
Half-face filter respirator

For high airborne concentrations, use an approved supplied-air respirator,
operated in positive pressure mode. Supplied air respirators with an escape
bottle may be appropriate when oxygen levels are inadequate, gas/vapor
warning properties are poor, or if air purifying filter capacity/rating
may be exceeded.

Hand Protection: Any specific glove information provided is based on published literature and glove manufacturer data. Work conditions can greatly affect glove durability; inspect and replace worn or damaged gloves. The types of gloves to be considered for this material include: If prolonged or repeated contact is likely, chemical resistant gloves are recommended. If contact with forearms is likely, wear gauntlet style gloves.

Eye Protection: If contact is likely, safety glasses with side shields are recommended.

Skin and Body Protection: Any specific clothing information provided is based on published literature or manufacturer data. The types of clothing to be considered for this material include: If prolonged or repeated contact is likely, chemical, and oil resistant clothing is recommended.

Specific Hygiene Measures: Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Discard contaminated clothing and footwear that cannot be cleaned. Practice good housekeeping.

ENVIRONMENTAL CONTROLS

See Sections 6, 7, 12, 13.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Typical physical and chemical properties are given below. Consult the Supplier in Section 1 for additional data.

GENERAL INFORMATION

Physical State: Liquid

Form: Clear

Color: Colorless

Odor: Aromatic

Odor Threshold: N/D

IMPORTANT HEALTH, SAFETY, AND ENVIRONMENTAL INFORMATION

Relative Density (at 15.6 C): 0.874

Density (at 15 C): 873 kg/m³ (7.29 lbs/gal, 0.87 kg/dm³)

Flash Point (Method): >42C (108F) (ASTM D-56)

Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 6.2

Autoignition Temperature: 479 C (894 F)

Boiling Point/Range: 161C (322F) - 171C (340F)

Vapor Density (Air = 1): 4.2 at 101 kPa

Vapor Pressure: 0.262 kPa (1.97 mm Hg) at 20 C 10.815 kPa (6.13 mm Hg) at 38C

Evaporation Rate (n-butyl acetate = 1): 0.27

pH: N/A

Log Pow (n-Octanol/Water Partition Coefficient): N/D

Solubility in Water: Negligible

Annotation:

Viscosity: 0.75 cSt (0.75 mm²/sec) at 40 C 0.9 cSt (0.9 mm²/sec) at 25C
Oxidizing Properties: See Sections 3, 15, 16.

OTHER INFORMATION

Freezing Point: -14 C (7 F)
Melting Point: N/D
Molecular Weight: 121
Hygroscopic: No
Coefficient of Thermal Expansion: 0.00085 V/DEGC

SECTION 10 STABILITY AND REACTIVITY

STABILITY: Material is stable under normal conditions.

CONDITIONS TO AVOID: Avoid heat, sparks, open flames and other ignition sources.

MATERIALS TO AVOID: Strong oxidizers, Nitric acid, Sulfuric acid

HAZARDOUS DECOMPOSITION PRODUCTS: Material does not decompose at ambient temperatures.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION 11 TOXICOLOGICAL INFORMATION

ACUTE TOXICITY

Route of Exposure	Conclusion/Remarks Inhalation
Toxicity: Data available.	Minimally Toxic. Based on test data for the material.
Irritation: Data available.	Elevated temperatures or mechanical action may form vapors, mist, or fumes which may be irritating to the eyes, nose, throat, or lungs. Based on test data for structurally similar materials.
Ingestion	
Toxicity: LD50 > 3000 mg/kg	Minimally Toxic. Based on test data for structurally similar materials.
Skin	
Toxicity: LD50 > 3160 mg/kg	Minimally Toxic. Based on test data for the material.
Irritation: Data available.	Mildly irritating to skin with prolonged exposure. Based on test data for the material.
Eye	
Irritation: Data available.	May cause mild, short-lasting discomfort to eyes. Based on test data for the material.

CHRONIC/OTHER EFFECTS

Annotation:

For the product itself:

Vapor/aerosol concentrations above recommended exposure levels are irritating to the eyes and respiratory tract, may cause headaches, dizziness, anesthesia, drowsiness, unconsciousness and other central nervous system effects including death.

Prolonged and/or repeated skin contact with low viscosity materials may defat the skin resulting in possible irritation and dermatitis.

Small amounts of liquid aspirated into the lungs during ingestion or from vomiting may cause chemical pneumonitis or pulmonary edema.

Contains:

CUMENE: Repeated inhalation exposure of cumene vapor produced damage in the kidney of male rats only. These effects are believed to be species specific and are not relevant to humans.

Additional information is available by request.

The following ingredients are cited on the lists below: None.

--REGULATORY LISTS SEARCHED--

1 = NTP CARC	3 = IARC 1	5 = IARC 2B
2 = NTP SUS	4 = IARC 2A	6 = OSHA CARC

SECTION 12 ECOLOGICAL INFORMATION

The information given is based on data available for the material, the components of the material, and similar materials.

ECOTOXICITY

Material -- Expected to be toxic to aquatic organisms. May cause long-term adverse effects in the aquatic environment.

MOBILITY

Material -- Highly volatile, will partition rapidly to air. Not expected to partition to sediment and wastewater solids.

PERSISTENCE AND DEGRADABILITY

Biodegradation:

Material -- Expected to be readily biodegradable.

Hydrolysis:

Material -- Transformation due to hydrolysis not expected to be significant.

Photolysis:

Material -- Transformation due to photolysis not expected to be significant.

Atmospheric Oxidation:

Material -- Expected to degrade rapidly in air

OTHER ECOLOGICAL INFORMATION

VOC (EPA Method 24): 7.294 lbs/gal

SECTION 13 DISPOSAL CONSIDERATIONS

Annotation:

Disposal recommendations based on material as supplied. Disposal must be in accordance with current applicable laws and regulations, and material characteristics at time of disposal.

DISPOSAL RECOMMENDATIONS

Product is suitable for burning in an enclosed controlled burner for fuel value or disposal by supervised incineration at very high temperatures to prevent formation of undesirable combustion products.

REGULATORY DISPOSAL INFORMATION

RCRA Information: Disposal of unused product may be subject to RCRA regulations (40 CFR 261). Disposal of the used product may also be regulated due to ignitability, corrosivity, reactivity or toxicity as determined by the Toxicity Characteristic Leaching Procedure (TCLP). Potential RCRA characteristics: IGNITABILITY.

Empty Container Warning

Empty Container Warning (where applicable): Empty containers may contain residue and can be dangerous. Do not attempt to refill or clean containers without proper instructions. Empty drums should be completely drained and safely stored until appropriately reconditioned or disposed. Empty containers should be taken for recycling, recovery, or disposal through suitably qualified or licensed contractor and in accordance with governmental regulations. DO NOT PRESSURISE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION. THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.

SECTION 14 TRANSPORT INFORMATION

LAND (DOT)

Proper Shipping Name: PETROLEUM DISTILLATES, N.O.S.

Hazard Class & Division: COMBUSTIBLE LIQUID

ID Number: 1268

Packing Group: III

Product RQ: 4545.45 lbs - XYLENES

ERG Number: 128

Label(s): NONE

Transport Document Name: UN1268, PETROLEUM DISTILLATES, N.O.S., COMBUSTIBLE LIQUID, PG III, RQ (Xylenes)

Footnote: The flash point of this material is greater than 100 F. Regulatory classification of this material varies. DOT: Flammable liquid or combustible liquid. OSHA: Combustible liquid. IATA/IMO: Flammable liquid. This material is not regulated under 49 CFR in a container of 119 gallon capacity or less when transported solely by land, as long as the material is not a hazardous waste, a marine pollutant, or specifically listed as a hazardous substance.

LAND (TDG)

Proper Shipping Name: PETROLEUM DISTILLATES, N.O.S.

Hazard Class & Division: 3

UNIVAR USA INC.
ISSUE DATE:2007-10-04

MSDS NO:EQ940652
VERSION:012 2007-12-10

Annotation:

UN Number: 1268
Packing Group: III

SEA (IMDG)

Proper Shipping Name: PETROLEUM DISTILLATES, N.O.S.
Hazard Class & Division: 3
EMS Number: F-E, S-E
UN Number: 1268
Packing Group: III
Label(s): 3
Transport Document Name: UN1268, PETROLEUM DISTILLATES, N.O.S., 3, PG III,
(42 deg C c.c.)

AIR (IATA)

Proper Shipping Name: PETROLEUM DISTILLATES, N.O.S.
Hazard Class & Division: 3
UN Number: 1268
Packing Group: III
Label(s): 3
Transport Document Name: UN1268, PETROLEUM DISTILLATES, N.O.S., 3, PG III

SECTION 15 REGULATORY INFORMATION

OSHA HAZARD COMMUNICATION STANDARD: When used for its intended purpose, this material is classified as hazardous in accordance with OSHA 29CFR 1910.1200.

NATIONAL CHEMICAL INVENTORY LISTING:

PICCS, EINECS, IECSC, DSL, AICS, ENCS, TSCA, KECI

EPCRA: This material contains no extremely hazardous substances.

CERCLA: This material is not subject to any special reporting under the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Contact local authorities to determine if other reporting requirements apply.

CERCLA:

Chemical Name	CAS Number	Typical Value	Component RQ	Product RQ
CUMENE	98-82-8	< 1.1%	5000 lbs	454545.45 lbs
XYLENES	1330-20-7	< 2.2%	100 lbs	4545.45 lbs

CWA/OPA: This product is classified as an oil under Section 311 of the Clean Water Act (40 CFR 110) and the Oil Pollution Act of 1990. Discharge or spills which produce a visible sheen on either surface water, or in waterways/sewers which lead to surface water, must be reported to the National Response Center at 800-424-8802.

SARA (311/312) REPORTABLE HAZARD CATEGORIES: Fire. Immediate Health.

SARA (313) TOXIC RELEASE INVENTORY:

Chemical Name	CAS Number	Typical Value
---------------	------------	---------------

UNIVAR USA INC.
ISSUE DATE:2007-10-04

MSDS NO:EQ940652
VERSION:012 2007-12-10

Annotation:

CUMENE	98-82-8	< 1.1%
PSEUDOCUMENE (1,2,4-TRIMETHYLBENZENE)	95-63-6	< 32%
XYLENES	1330-20-7	< 2.2%

The Following Ingredients are Cited on the Lists Below:

Chemical Name	CAS Number	List Citations
CUMENE	98-82-8	1, 4, 13, 16, 17, 18, 19
PSEUDOCUMENE TRIMETHYLBENZENE)	95-63-6	1, 13, 16, 17, 18, 19 (1,2,4-
XYLENES	1330-20-7	1, 4, 5, 9, 13, 15, 16, 17, 18, 19

--REGULATORY LISTS SEARCHED--

1 = ACGIH ALL	6 = TSCA 5a2	11 = CA P65 REPRO	16 = MN RTK
2 = ACGIH A1	7 = TSCA 5e	12 = CA RTK	17 = NJ RTK
3 = ACGIH A2	8 = TSCA 6	13 = IL RTK	18 = PA RTK
4 = OSHA Z	9 = TSCA 12b	14 = LA RTK	19 = RI RTK
5 = TSCA 4	10 = CA P65 CARC	15 = MI 293	

Code key: CARC=Carcinogen; REPRO=Reproductive

SECTION 16 OTHER INFORMATION

N/D = Not determined, N/A = Not applicable

WELDING INFORMATION

Melissa L. Armer

Subject: FW: Frazier Industrial - Welding fumes

From: Kris Buck [mailto:Kris.Buck@Hobartbrothers.com]
Sent: Wednesday, June 01, 2011 2:40 PM
To: Melissa L. Armer
Cc: Richard W. Peake; Sonny_McCay@Praxair.com
Subject: RE: Frazier Industrial - Welding fumes

Melissa,

FGR is Fume Generation Rate. It is a unitless number in that the 0.35 is a ratio of pounds of fume over 100 pounds of wire consumed. The spectrograph only designates Manganese, Chromium, Nickel and not oxides or valences.

Regards.

Kristopher Buck

Environmental, Health and Safety Manager

Hobart Brothers Co. An ITW Company

101 Trade Square East

Troy, OH 45373

937-332-5313 Office

937-332-5700 Fax

937-216-2333 Mobile

kris.buck@hobartbrothers.com

www.hobartbrothers.com

-----Original Message-----

From: Richard W. Peake [mailto:rpeake@frazier.com]

Sent: Wednesday, June 01, 2011 7:06 AM

To: Melissa L. Armer

Subject: FW: MetAlloy 76 data

Weld wire information from Hobart..

-----Original Message-----

From: Sonny_McCay@Praxair.com [mailto:Sonny_McCay@Praxair.com]

Sent: Wednesday, June 01, 2011 9:05 AM

To: Richard W. Peake

Subject: Fw: MetAlloy 76 data

Hello Richard

Here is the info I received from Hobart if you have any questions let me know.

Thank You

Sonny McCay

Branch Manager

Praxair Distribution Inc.

Sonny_McCay@Praxair.com

Office Phone: +1 (208) 232-1909

Mobile: +1 (208) 351-0872

Office Fax: +1 (208) 234-7166

P Please consider the environment before printing this e-mail.

This e-mail, including any attachments, is intended solely for the person or entity to which it is addressed and may contain confidential, proprietary and/or non-public material. Except as stated above, any review, re-transmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than an intended recipient is prohibited. If you receive this in error, please so notify the sender and delete the material from any media and destroy any printouts or copies.

----- Forwarded by Sonny McCay/USA/NA/Praxair on 06/01/2011 07:03 AM -----

"Kris Buck"

<Kris.Buck@Hobart
brothers.com>

To

<sonny_mccay@praxair.com>

06/01/2011 06:14
AM

cc

Subject

MetAlloy 76 data

Sonny,

It was good to speak with you. Here is the information requested.

FGR Data...

FGR for 0.045" at ¾ ESO at 295A and 29V using SG AC10 at 45 cfh is 0.35

FGR for 0.052" at ¾ ESO at 339A and 30V using SG AC10 at 45 cfh is 0.30

% Fume...

Typical percentages using 75/25 gas are

Fe and FeOx - balance

Mn - 15.4%

Ni - 0.01%

Cr - 0.03%

Pb - 0.01%

F - 0.01%

Let me know if there is further information needed or if you need me to go over the data.

Regards.

Kristopher Buck
Environmental, Health and Safety Manager

Hobart Brothers Co. An ITW Company
101 Trade Square East
Troy, OH 45373
937-332-5313 Office
937-332-5700 Fax
937-216-2333 Mobile
kris.buck@hobartbrothers.com
www.hobartbrothers.com

P Please consider the environment before printing this email.

This message (including any attachments) is intended for the sole use of the intended recipient/s and may contain material that is CONFIDENTIAL AND PRIVATE COMPANY INFORMATION. If you are not the intended recipient of this message, you are hereby notified that you must delete the message without disseminating, copying or taking any action in reliance upon it. If you have received this message in error, please notify the sender via return e-mail. Thank you.



Please consider the environment before printing this email.

This message (including any attachments) is intended for the sole use of the intended recipient/s and may contain material that is **CONFIDENTIAL AND PRIVATE COMPANY INFORMATION**. If you are not the intended recipient of this message, you are hereby notified that you must delete the message without disseminating, copying or taking any action in reliance upon it. If you have received this message in error, please notify the sender via return e-mail. Thank you.

APPENDIX G
AMBIENT IMPACT ANALYSIS



June 15, 2011

Shannon Manoulian
JBR Environmental Consultants, Inc.
Boise, ID

RE: Modeling Protocol for the Frazier Industrial Company proposed facility in Idaho Falls

Shannon:

DEQ received your dispersion modeling protocol submitted to me via email on June 2, 2011. The modeling protocol was submitted on behalf of Frazier Industrial Company (Frazier). The modeling protocol proposes methods and data for use in the ambient impact analyses of a Permit to Construct application for a proposed new structural steel storage system manufacturing plant.

The modeling protocol has been reviewed and DEQ has the following comments:

- Comment 1: The submitted application must provide thorough and complete justification and documentation of release parameters of all sources included in the modeling analyses. As results approach applicable standards, DEQ will demand a greater degree of stack parameter justification. Submitted documentation should indicate the source of flow rate data and specify whether rates are a design maximum or more typical operational rate.
- Comment 2: The proposed receptor grid appears reasonable. However, it is the applicant's responsibility to use a sufficiently tight receptor network such that the maximum modeled concentration is reasonably resolved. If DEQ conducts verification modeling analyses with a tighter receptor grid and compliance with standards is no longer demonstrated, the permit will be denied.
- Comment 3: DEQ has preprocessed meteorological data for Idaho Falls. These data will be emailed to you for use in the model.
- Comment 4: The current version of AERMOD is 11103, and this version should be used for all modeling performed for permitting purposes.
- Comment 5: Emissions of PM_{2.5} are between Level I and Level II modeling thresholds, meaning that the decision of whether modeling is required will be made on a case-by-case basis considering the release parameters, distance to ambient air, sensitive receptors, and other co-contributing PM_{2.5} sources in the area. Emissions release parameters are not conducive to good dispersion and the distance between release points and ambient air is rather short. However, emissions are scattered among numerous different release points and there are no identified co-contributing PM_{2.5} sources in the area. Since there are no co-contributing sources, DEQ calculated a revised Level I threshold designed to keep

impacts below the 35 $\mu\text{g}/\text{m}^3$ standard (when combined with a representative or conservative background value). A 24-hour PM_{2.5} background concentration of 20.8 $\mu\text{g}/\text{m}^3$ was calculated from Idaho Falls monitoring data, using the 3-year average of the upper 98th percentile of 24-hour averaged concentrations for years 2001, 2002, and 2003 (monitoring was discontinued for Idaho Falls in 2004). Subtracting background from the standard leaves an allowable increment of 14.2 $\mu\text{g}/\text{m}^3$. Using the modeling results from analyses used to generate Level I thresholds, it was calculated that PM_{2.5} emissions of less than 0.63 lb/hr will assure impacts plus background will be less than the standard. Since total PM_{2.5} emissions were calculated by JBR at 0.13 lb/hr, DEQ is satisfied that such emissions will not cause or significantly contribute to a violation of the standard.

- Comment 6: JBR proposed to run AERMOD in screening mode. DEQ recommends using the regulatory default option rather than running AERMOD in screening mode to provide greater assurance that results demonstrate compliance with TAP increments.
- Comment 7: JBR indicated that TAPs would be conservatively modeled from a single stack rather than from each of the dip tank stacks. The submitted application must clearly describe and demonstrate that the stack selected is worst-case from a dispersion standpoint. This should be done by comparing stack parameters, downwash potential, and the distance to ambient air. Alternatively, all three stacks could be modeled and the worst case result used to calculate TAP impacts.

DEQ's modeling staff considers the submitted dispersion modeling protocol, with resolution of the additional items noted above, to be approved. It should be noted, however, that the approval of this modeling protocol is not meant to imply approval of a completed dispersion modeling analysis. Please refer to the *State of Idaho Air Quality Modeling Guideline*, which is available on the Internet at http://www.deq.state.id.us/air/permits_forms/permitting/modeling_guideline.pdf, for further guidance.

To ensure a complete and timely review of the final analysis, our modeling staff requests that electronic copies of all modeling input and output files (including BPIP and AERMAP input and output files) are submitted with an analysis report. If DEQ provided model-ready meteorological data files, then these do not need to be resubmitted to DEQ with the application. If you have any further questions or comments, please contact me at (208) 373-0112.

Sincerely,

Kevin Schilling

Kevin Schilling
Stationary Source Air Modeling Coordinator
Idaho Department of Environmental Quality
208 373-0112

Frazier Industrial Company

Air Quality Modeling Report

Idaho Falls Facility

Prepared for:

Frazier Industrial Company
P.O. Box 808
4537 Lamar Highway
Lamar, SC 29069
Contact: Richard Peake

Prepared by:

JBR Environmental Consultants, Inc.
7669 W. Riverside Drive, Ste 101
Boise, ID 83714
Contact: Shannon Manoulian
208.853.0883

June 2011



creating solutions for today's environment



www.jbrenv.com

TABLE OF CONTENTS

1.0	PURPOSE.....	1
1.1	Process Description	1
2.0	MODEL DESCRIPTION / JUSTIFICATION	4
3.0	EMISSION AND SOURCE DATA	5
3.1	Source Parameters	6
4.0	RECEPTOR NETWORK.....	9
5.0	ELEVATION DATA	9
6.0	METEOROLOGICAL DATA.....	9
7.0	LAND USE CLASSIFICATION.....	9
8.0	BACKGROUND CONCENTRATIONS.....	10
9.0	APPLICABLE REGULATORY LIMITS	10
10.0	ELECTRONIC COPIES OF MODEL FILES.....	10

LIST OF TABLES

Table 1	Project Potential Criteria Pollutant Emissions vs. IDEQ Modeling Thresholds.....	5
Table 2	Project Potential TAPs Emissions vs. IDEQ Modeling Thresholds	6
Table 3 – 1, 2,4-Trimethylbenzene	Model Predicted Impacts	10

LIST OF FIGURES

Figure 1 – Approximate Facility Location.....	2
Figure 2 – Dip Tank Configuration	3
Figure 3 – Model Facility Layout	7
Figure 4 – Full Receptor Network	8

LIST OF APPENDICES

Appendix A – Emissions Inventory

1.0 PURPOSE

This air quality modeling report documents the methodology used to prepare an air quality analyses in support of an Idaho Department of Environmental Quality (IDEQ) 15-Day Pre-Permit Construction (15-Day) application and subsequent Permit to Construct (PTC) application for the new Frazier Industrial Company (Frazier) facility located in Idaho Falls, Bonneville County, Idaho (Figure 1). This report seeks to fully document and report the methods and techniques used to perform the modeling in support of Frazier's 15-Day and PTC applications in order to gain concurrence from IDEQ staff.

1.1 Process Description

Frazier Industrial Company (Frazier) manufactures structural steel storage systems. At the Idaho Falls facility, steel is delivered to the facility and is then cut and welded into product components. The type of welding conducted at the facility is gas metal arc welding or metal inert gas (MIG) welding. The welded steel components are then bundled and prepared to be coated with paint.

The steel components are coated using a dip tank paint system consisting of three large rectangular steel tanks used to contain the paint. Tank 1 and Tank 2 typically contain orange paint and Tank 3 contains blue paint. Frazier also has the capability of coating its steel components with yellow paint. The yellow paint is used less frequently than the orange and blue paint and based on customer demand. The yellow paint is placed in Tank 2 after the orange paint has been fully cleaned out.

Each dip tank system is internally fabricated. The dip tank system is capable of keeping the paint mixed, filtered and within a predetermined temperature. Figure 2 below shows the dip tank configuration.

Aromatic 100 solvent is stored in 55 gallon metal drums. The solvent is added to the dip tanks to obtain the desired paint viscosity. The solvent is also occasionally used to clean paint from rollers, scrapers and other tools used in the painting operation. The solvent that is used for cleaning is recycled back into the process by being mixed in the dip tanks when needed. The orange, blue, and yellow paint is also stored in metal mobile totes prior to being placed in the dip tanks. Each storage tote is approximately 330 gallons and the lid is closed when not in use. The dip tank is open when steel is being dipped and is closed when not in use. The facility utilizes a wall exhaust fan to provide building ventilation. The exhaust fan does not control emissions from the building.

Steel components are typically dipped and kept in the dip tank for a minimum of two minutes. Once the steel components are coated they are hoisted out of the tank and allowed to drain for approximately 25 minutes. Next, a nap paint roller is used to smooth out any excess paint and coat unpainted surfaces. The painted steel components are then sent to the storage area where the finished product is stored until it is shipped to the customer.

Figure 1 – Approximate Facility Location

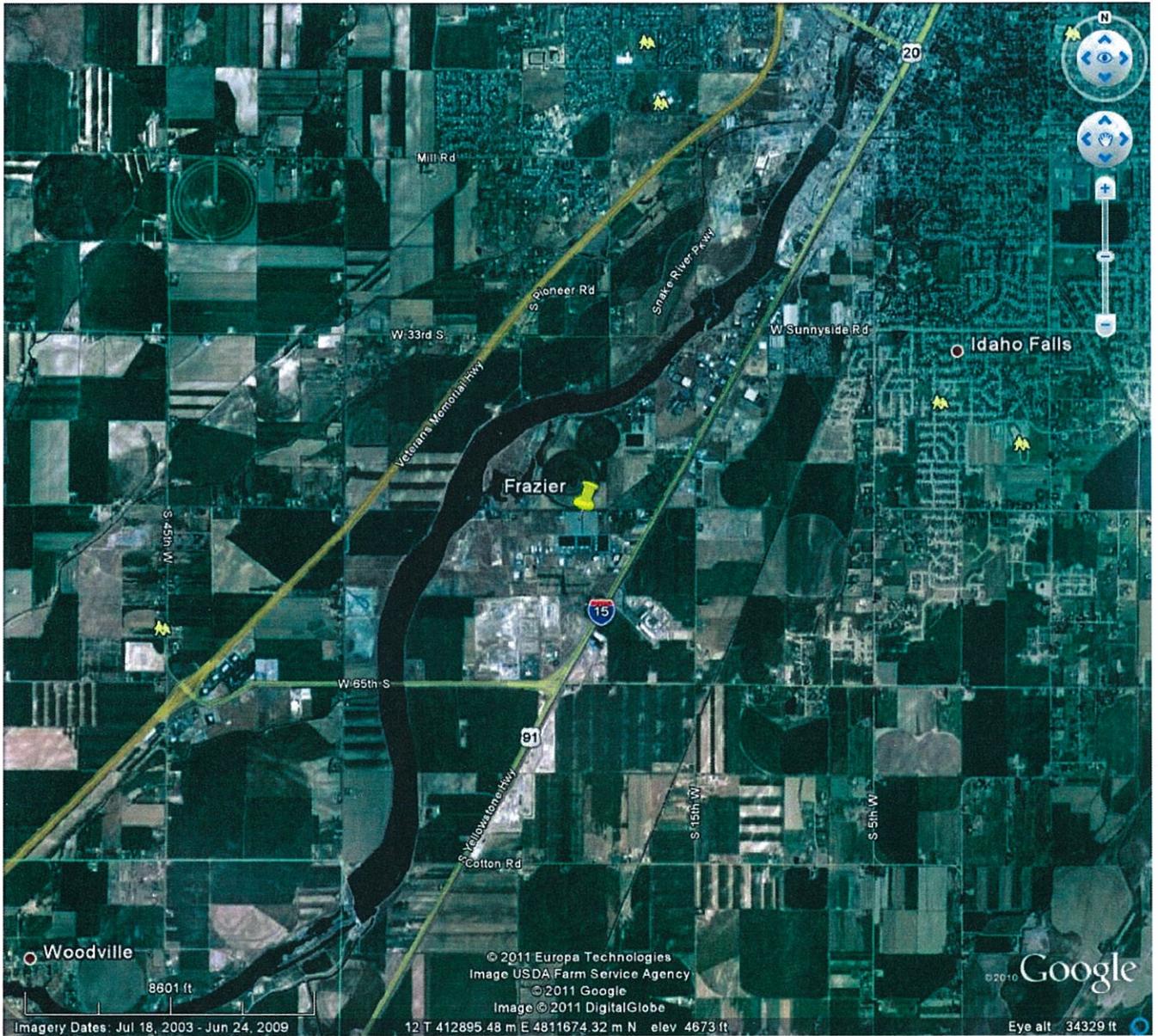
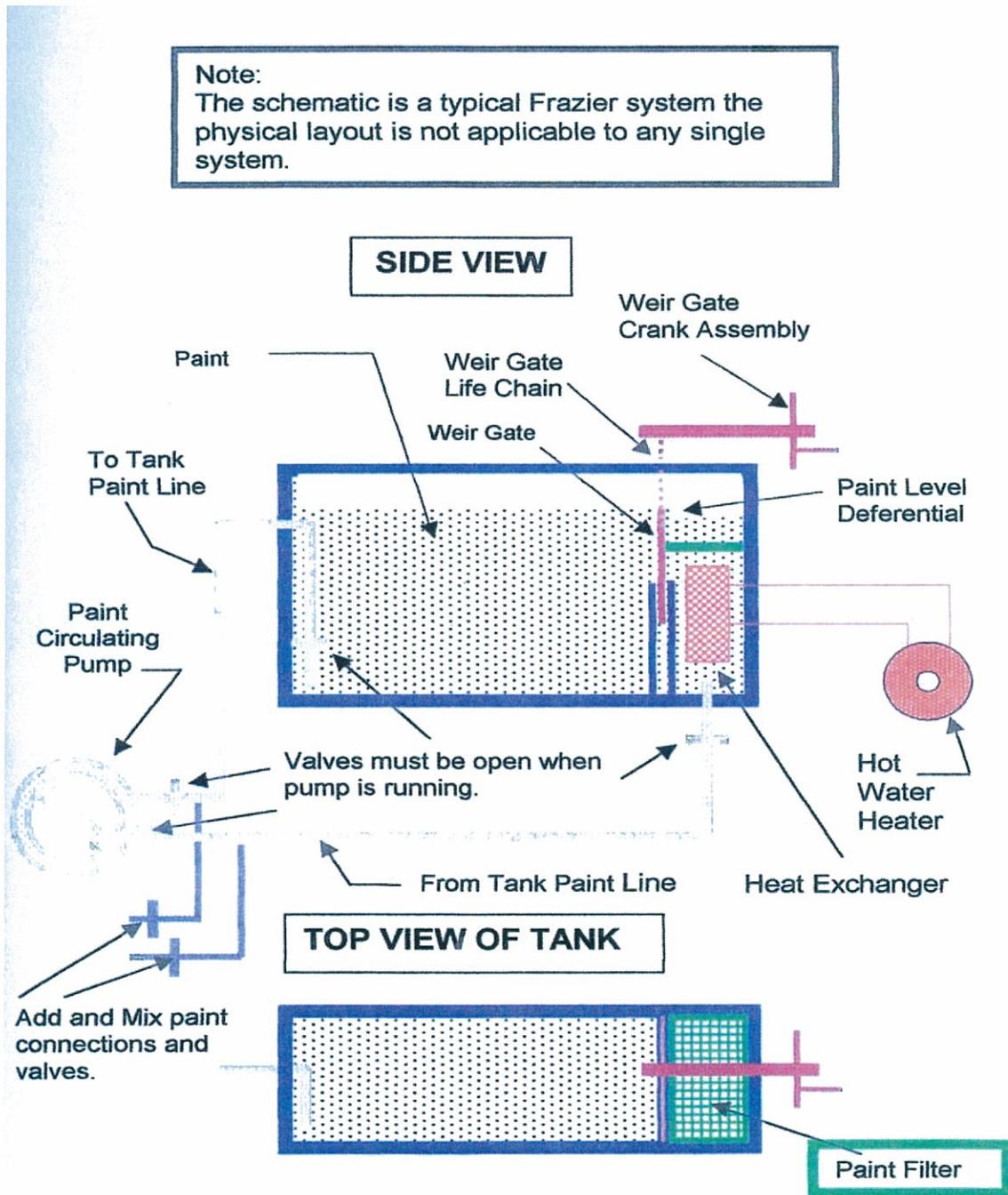


Figure 2 – Dip Tank Configuration



2.0 MODEL DESCRIPTION / JUSTIFICATION

The model used for this application is AERMOD (version 11103), the USEPA-approved model for near-field new source review. AERMOD is one of the most frequently used regulatory dispersion models in the United States since it replaced ISCST3. Based on EPA guidance AERMOD is the most appropriate of the EPA-approved models given the site's physical characteristics and the facility emission sources. AERMOD was applied as recommended in EPA's Guideline on Air Quality Models and consistent with guidance in IDEQ's Dispersion Modeling Guidelines. The Prime building downwash algorithm was applied for the facility. Recommended regulatory default options were employed. Terrain data was processed consistent with the model protocol and EPA guidance for AERMAP. Meteorological data recommended for this analysis was provided by IDEQ.

IDEQ requires modeling of criteria pollutants if emissions from the proposed source exceed the modeling thresholds set forth in the IDEQ Dispersion Modeling Guidelines. Emissions of PM_{2.5} occur from welding. However PM_{2.5} emissions from the facility fall between the unconditional (0.05 lb/hr) and conditional (0.6 lb/hr) modeling thresholds. Frazier requested that DEQ not require modeling of PM_{2.5} emissions, based on facility location, stack parameters and process information. IDEQ responded to the request in the model protocol approval with the following explanation:

“Emissions release parameters are not conducive to good dispersion and the distance between release points and ambient air is rather short. However, emissions are scattered among numerous different release points and there are no identified co-contributing PM_{2.5} sources in the area. Since there are no co-contributing sources, DEQ calculated a revised Level I threshold designed to keep impacts below the 35 µg/m³ standard (when combined with a representative or conservative background value). A 24-hour PM_{2.5} background concentration of 20.8 µg/m³ was calculated from Idaho Falls monitoring data, using the 3-year average of the upper 98th percentile of 24-hour averaged concentrations for years 2001, 2002, and 2003 (monitoring was discontinued for Idaho Falls in 2004). Subtracting background from the standard leaves an allowable increment of 14.2 µg/m³. Using the modeling results from analyses used to generate Level I thresholds, it was calculated that PM_{2.5} emissions of less than 0.63 lb/hr will assure impacts plus background will be less than the standard. Since total PM_{2.5} emissions were calculated by JBR at 0.13 lb/hr, DEQ is satisfied that such emissions will not cause or significantly contribute to a violation of the standard.”

Emissions of 1,2,4-Trimethylbenzene emissions exceed the TAPs screening emission level (EL) in IDAPA 58.01.01.585, therefore modeling was performed to show compliance with the AAC.

In general, the AERMOD model application used model source data consistent with the permit emission inventory. The model receptor network and model domain used meet all EPA and IDEQ recommendations, and ensure a complete dispersion analysis that captures

maximum potential impacts. Only direct chemical emissions and transport were considered in this analysis; chemical transformation of emissions was not considered in this analysis.

3.0 EMISSION AND SOURCE DATA

Modeled emissions will include emissions of 1,2,4-Trimethylbenzene, modeled as being emitted from three stacks, each located above the center of each dip tank. There will be three dip tanks at the facility; the blue tank, big orange tank and small orange tank. Each tank will also have solvent mixed in with the paint. Blue paint has the highest emissions of 1,2,4-Trimethylbenzene; therefore as a conservative measure it will be assumed that all tanks (and associated stack emissions) will contain blue paint and one-third of the total amount of solvent. Emission rates represent the maximum anticipated operating rates for the averaging period modeled, taking into account the maximum daily hours of operation and throughputs requested in the application for all averaging periods. The total facility-wide 1,2,4-Trimethylbenzene emissions are 12.9 lb/hr; the screening emissions level for the pollutant is 8.2 lb/hr.

Table 1 below compares the facility's Potential to Emit (PTE) for all criteria pollutants against IDEQ Modeling Thresholds. Table 2 compares the facility's PTE for those Toxic Air Pollutants (TAPs) that are emitted from the manufacturing and painting process. Emission summaries are documented in more detail in the facility's emission inventory in Appendix A.

Table 1 Project Potential Criteria Pollutant Emissions vs. IDEQ Modeling Thresholds

Criteria Modeling Check	PM ₁₀	PM _{2.5} *	NO _x	SO ₂ *	CO*	Pb
Controlled Emission Rates (tons per year)	0.35	0.13	0	0	0	3.5E-05
Modeling Threshold (tons per year)	1.0	0.6	1.0	0.2	14	0.6
Modeling Required:	NO	NO	NO	NO	NO	NO

*PM_{2.5}, CO and SO₂ modeling threshold is in lb/hr.

**The 0.6 lb/hr modeling threshold is the conditional threshold; determination made by DEQ as described above.

Table 2 Project Potential TAPs Emissions vs. IDEQ Modeling Thresholds

Criteria Modeling Check	Controlled Emission Rates (lb/hr)	Modeling Threshold (lb/hr)	Modeling Required?
n-Butyl Alcohol	2	10	No
Xylene	1	29	No
Ethyl Benzene	0.2	29	No
Stoddard	1	35	No
Cumene	0.1	16.3	No
Trimethyl Benzene	12.9	8.2	Yes
Iron Oxide	0.106	0.333	No
Manganese	0.019	0.067	No
Nickel	1.3E-05	2.7E-05	No
Chromium	3.8E-05	0.033	No
Fluorine	1.3E-05	0.133	No

3.1 Source Parameters

Emissions sources that were included in the model are listed below:

- Blue Paint Tank (with 1/3 solvent)
- Big Orange Tank (with 1/3 solvent)
- Small Orange Tank (with 1/3 solvent)

As discussed above, 1,2,4-Trimethylbenzene emissions associated with blue paint are higher than with the orange or yellow paint used at the Frazier facility, and therefore emissions from the blue dip tank stack will be higher than the emissions from the small orange or big orange dip tank stacks. Although blue paint will only be used in the blue dip tank, it was conservatively assumed that the emissions from each stack will be equal to the emissions from the blue paint/solvent mixture. All three stacks will have raincaps; per IDEQ guidance, they will be modeled as point sources with an exit velocity of 0.001 m/s. The model source parameters for the on-site emissions sources modeled are shown in Appendix B.

The model facility layout including the three point sources, main manufacturing building, administrative building, and property boundary is shown in Figure 3. The full receptor network is shown in Figure 4.

Figure 3 – Model Facility Layout

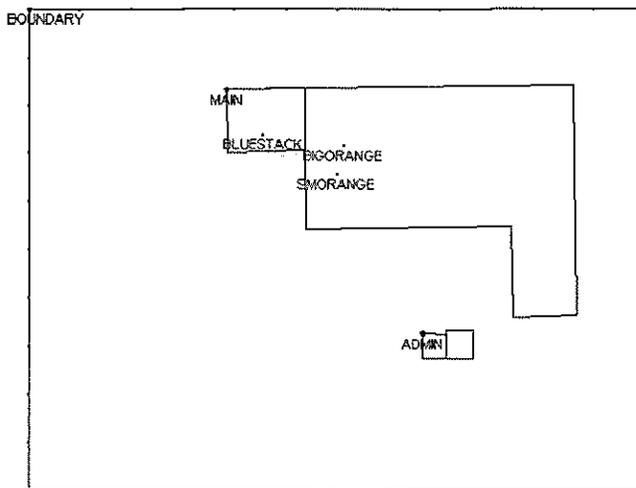
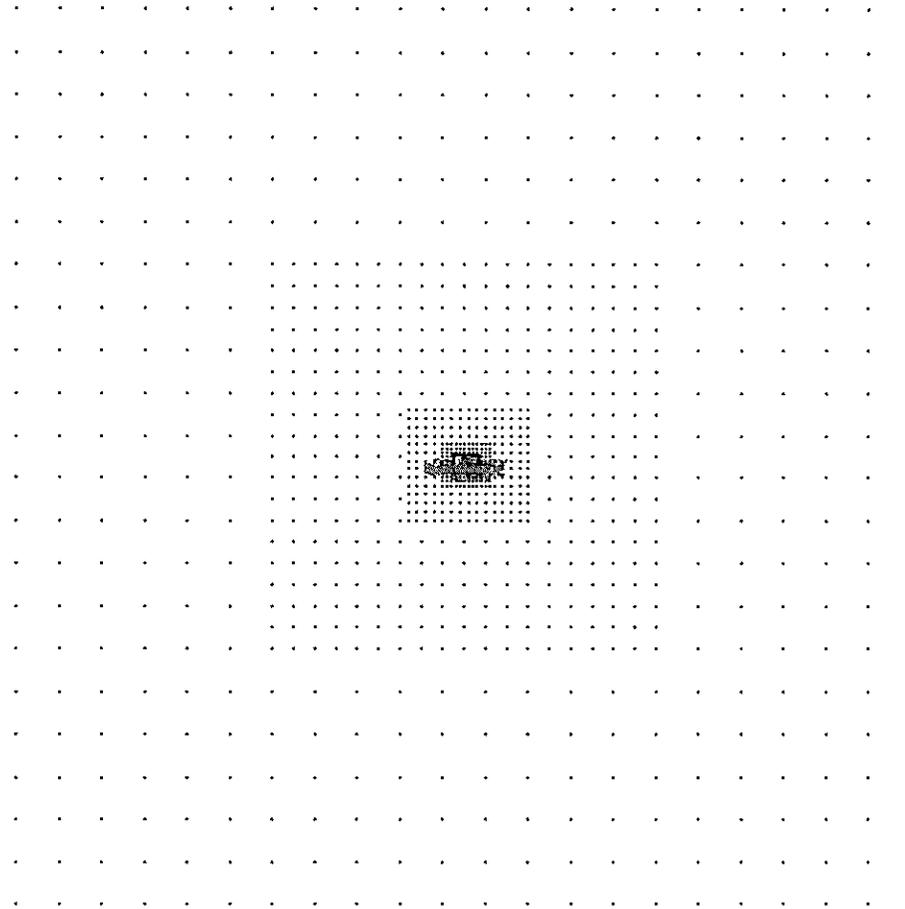


Figure 4 – Full Receptor Network



4.0 RECEPTOR NETWORK

The Frazier facility is located in Idaho Falls, Bonneville County, Idaho. The property covers approximately 15 acres, and is surrounded by agricultural and light industrial/commercial properties. Consistent with IDEQ guidance the ambient air boundary used in this analysis will be the property boundary, which also serves as the public access boundary. Frazier will control access to the property through posting of signage and by training facility personnel to patrol and prevent public access.

Receptor density was set to a spacing of 25 meters along the ambient air boundary, 50 meters for the first 100 meters past the boundary, then receptors were set a density of one per 100 meters out to 500 meters away from the property boundary, 250 meters out to 2,000 meters from the ambient air boundary, and 500 meters out to 5 kilometers past the ambient air boundary. The receptor network ensures that the analysis meets or exceeds EPA receptor network requirements and captures the maximum impact from the facility. Therefore, no supplemental receptor network or expansion of the model domain will be required or was included.

5.0 ELEVATION DATA

All source base and receptor elevations were calculated from USGS NED data using the Bee-Line BEEST preprocessing system.

6.0 METEOROLOGICAL DATA

Preprocessed AERMOD ready meteorological files were provided from Kevin Schilling of IDEQ. The data presented by IDEQ is model-ready, and was used without alteration or processing.

7.0 LAND USE CLASSIFICATION

AERMOD includes rural and urban algorithm options. These options affect the wind speed profile, dispersion rates, and mixing-height formula used in calculating ground-level pollutant concentrations. A protocol was developed by USEPA to classify an area as either rural or urban for dispersion modeling purposes. The classification is based on average heat flux, land use, or population density within a three-km radius from the plant site. Of these techniques, the USEPA has specified that land use is the most definitive criterion (USEPA, 1987). The urban/rural classification scheme based on land use is as follows:

The land use within the total area, A_0 , circumscribed by a 3-km circle about the source, is classified using the meteorological land use typing scheme proposed by Auer (1978). The classification scheme requires that more than 50% of the area, A_0 , be from the following land use types in order to be considered urban for dispersion modeling purposes: heavy industrial (I1); light-moderate industrial (I2); commercial (C1); single-family compact residential (R2); and multi-family compact residential (R3). Otherwise, the use of rural dispersion coefficients is appropriate.

The Frazier facility is located just outside of the city center of Idaho Falls and is bordered by agricultural and light commercial/industrial properties. The area A₀ within a 3-km circle of the source is below the 50% urban land use criteria necessary for use of urban dispersion coefficients. Rural dispersion coefficients were therefore used in the air quality dispersion modeling.

8.0 BACKGROUND CONCENTRATIONS

TAPS

Background concentrations of TAPS are zero.

9.0 APPLICABLE REGULATORY LIMITS

The air quality impact limits applicable to this analysis are the Acceptable Ambient Concentrations (AAC) for IDAPA 58.01.01.585 TAPS. Model predicted maximum impacts shown in Table 3 are the highest first high over the 5-year period modeled.

Table 3 – 1, 2,4-Trimethylbenzene Model Predicted Impacts

Stack ID	Averaging Period	Background Concentration (ug/m³)	Modeled Impact (ug/m³)	Total Concentration (ug/m³)	AAC (ug/m³)
BLUESTACK	24-hr	0	108.11	108.11	6,150
BIGORANGE	24-hr	0	190.37	190.37	6,150
SMORANGE	24-hr	0	354.65	354.65	6,150
Total	24-hr	0	484.11	484.11	6,150

Table 3 shows that predicted maximum ambient concentrations for 1,2,4-Trimethylbenzene below the AAC, even with the conservative assumption that blue paint/solvent mixture emissions would be emitted from all stacks. The highest impacts modeled were observed at receptors located along both the north and south property boundary (the highest first high value is located along the north property boundary) and dropped off quickly beyond the property boundary.

10.0 ELECTRONIC COPIES OF MODEL FILES

Electronic copies of all input, output, and support modeling files necessary to duplicate the model results accompany this submittal to IDEQ.



APPENDIX A

	POTENTIAL TO EMIT				STACK PARAMETERS							
	PM-10 (lb/hr)	PM-10 (T/yr)	Lead (lb/hr)	Lead (T/yr)	VOC (lb/hr)	VOC (T/yr)	HAP (lb/hr)	HAP (T/yr)	Ht (ft)	Diam (in)	Flow Rt. (cfm)	Temp (oF)
Dip Tank 1 ^{a b c} Orange					13.97	27.69	0.77	1.42	39	24	8230	amb
Dip Tank 2 ^{b c} Orange or Yellow					13.97	33.11	0.77	1.45	39	24	8230	amb
Dip Tank 3 ^c Blue					13.96	37.50	0.13	0.36	51	24	8230	amb
Welding Total ^{d e}	0.13	0.35	1.3E-05	3.5E-05			0.0001	0.0002				
Welding 1	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 2	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 3	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 4	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 5	0.006	0.02	6.3E-07	1.8E-06					29	36	4840	amb
Welding 6	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 7	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 8	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 9	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 10	0.006	0.02	6.3E-07	1.8E-06					33	36	4840	amb
Welding 11	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 12	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 13	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 14	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 15	0.006	0.02	6.3E-07	1.8E-06					30	36	4840	amb
Welding 16	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 17	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 18	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 19	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Welding 20	0.006	0.02	6.3E-07	1.8E-06					27	36	4840	amb
Total	0.13	0.35	1.3E-05	3.5E-05	41.90	98.30	1.67	3.23				

^a Solvent is used in all three tanks. Assumed total solvent emissions are divided equally between the three tanks.

^b Yellow paint is occasionally used in Tank #2

Worst case annual tpy VOC and HAPs assumes orange + solvent in Tank #2 and yellow + solvent being used in Tank #2.

Worst case hourly lb/hr VOC and HAPs assumes orange + solvent in Tank #2

^c Dip tank stacks will have rain caps- vertical stacks

^d Welding vertical vents will have butterfly closure when fan is not operating

^e Welding emissions will be divided equally between 20 vents; 5 equally spaced down center of each Bay; 5 located throughout building based on ventilation needs.

**FRAZIER INDUSTRIAL COMPANY
POCATELLO, ID**

Source

Pollutant	Total (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
n-Butyl Alcohol	2	10	No
Xylene	1	29	No
Ethyl Benzene	0.2	29	No
Stoddard	1	35	No
Cumene	0.1	16.3	No
Trimethyl Benzene	12.9	8.2	Yes
Iron Oxide	0.106	0.333	No
Manganese	0.019	0.067	No
Nickel	1.3E-05	2.7E-05	No
Chromium	3.8E-05	0.033	No

**DIP TANK 1
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New Fast Dry Orange- High Solids
Coating ID: 43-62154B
Density (lb/gal): 10.33
Potential Gallons Mixture Applied (gal/yr)^b: 10,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.094	2.92	4.87	na	na
n-Butyl Alcohol	71-36-3	0.025	0.79	1.31	na	na
Xylene (mixed isomers)	1330-20-7	0.0169	0.52	0.87	0.524	0.87
Ethyl Benzene	100-41-4	0.004	0.11	0.19	0.112	0.19
Other VOCs	108-67-8	0.1775	5.50	9.17	na	na
TOTAL ^a		0.3176	9.84	16.40	0.64	1.06

^aOnly non-exempt VOC and HAP components are summed.

^bTotal Orange Paint Usage is 20,000 gal/yr and is divided between Tanks #1 and #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**DIP TANK 2
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New Fast Dry Orange- High Solids
 Coating ID: 43-62154B
 Density (lb/gal): 10.33
 Potential Gallons Mixture Applied (gal/yr)^b: 10,000
 Max Potential Gallons (gal/hr)^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.094	2.92	4.87	na	na
n-Butyl Alcohol	71-36-3	0.025	0.79	1.31	na	na
Xylene (mixed isomers)	1330-20-7	0.017	0.52	0.87	0.52	0.87
Ethyl Benzene	100-41-4	0.004	0.11	0.19	0.11	0.19
Other VOCs	108-67-8	0.178	5.50	9.17	na	na
TOTAL^a		0.3176	9.84	16.40	0.64	1.06

^aOnly non-exempt VOC and HAP components are summed.

^bTotal Orange Paint Usage is 20,000 gal/yr and is divided between Tanks #1 and #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**DIP TANK 3
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: New FD Blue- HS Dip
Coating ID: 43-41491B
Density (lb/gal): 10.37
Potential Gallons Mixture Applied (gal/yr): 16,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.1000	3.11	8.30	na	na
n-Butyl Alcohol	71-36-3	0.026	0.82	2.18	na	na
Other VOCs ^b		0.190	5.90	15.74	na	na
TOTAL^a		0.316	9.83	26.22	na	na

^aOnly non-exempt VOC and HAP components are summed.

^bTotal volatile wt% from MSDS sheet = 31.6

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**YELLOW PAINT
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: X-9228 MDI Yellow UV Guard
Coating ID: Sheyboygan 43-62028
Density (lb/gal): 10.45
Potential Gallons Mixture Applied (gal/yr) ^b: 4,000
Max Potential Gallons (gal/hr) ^c: 3.00

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4- Trimethylbenzene	64742-95-6	0.067	2.09	1.39	na	na
Ethyl Benzene	100-41-4	0.002	0.05	0.03	0.047	0.03
Stoddard Solvent	8052-41-3	0.033	1.02	0.68	na	na
Petroleum Naphtha	64742-48-9	0.020	0.61	0.41	na	na
n-Butyl Alcohol	71-36-3	0.010	0.32	0.21	na	na
Unspecified VOC		0.129	4.03	2.69	na	na
TOTAL^a		0.259	8.12	5.42	0.05	0.03

^aOnly non-exempt VOC and HAP components are summed.

^bYellow paint is only used once or twice a year and usually in Dip Tank #2

^cMaximum potential gallons per hour estimated based on paint usage at other Frazier plants

**SOLVENT MIXED IN TANKS
PROPOSED EMISSIONS
VOC and HAP**

Max VOC Coating: Aromatic 100 Solvent
Coating ID: EQ940652
Density (lb/gal): 7.29
Potential Gallons Mixture Applied (gal/yr): 9,300
Potential Gallons (gal/hr): 1.70

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)
1,2,4-Trimethylbenzene	95-63-6	0.320	3.97	10.85	na	na
Cumene	98-82-8	0.010	0.12	0.34	0.124	0.34
Xylene	1330-20-7	0.022	0.27	0.75	0.273	0.75
Other VOCs	108-67-8	0.647	8.02	21.93	na	na
TOTAL^a		0.999	12.38	33.86	0.40	1.08

^aOnly non-exempt VOC and HAP components are summed.

PROPOSED EMISSIONS

Carbon Steel Electrode

Welding Wire Usage= 200,000 lb/yr
 Welding Hours= 5,600 hr/yr
 Welding Wire Usage= 35.71 lb/hr

Manufacturer's Data (see attached email)

Fume Generation Rate= 0.35 lb/100 lb welding wire
 Particulate Emission= 0.125 lb/hr

AP-42 Data ^a

GMAW 24.1 lb/10³ lb electrode
 Average for Electrode Type
 E70 5.2 lb/10³ lb electrode
 Particulate Emission= 0.186 lb/hr

Component ^b	Wt % Chemistry	TAP Y/N	HAP Y/N	PM10 Emissions	
				(lb/hr)	(tpy)
Particulate ^c				0.125	0.350
Iron Oxide	85%	Y	N	0.106	0.296
Manganese	15.4%	Y	N	0.019	0.054
Nickel	0.01%	Y	Y	1.3E-05	3.5E-05
Chromium	0.03%	Y	Y	3.8E-05	1.1E-04
Fluorine	0.01%	Y	N	1.3E-05	3.5E-05
Lead	0.01%	Y	Y	1.3E-05	3.5E-05

^a AP-42 Table 12-19.1

^b Source: Manufacturer's Information- Email from Kristopher Buck Hobart Brothers

^c Assume all particulate emissions are PM-10



APPENDIX B

Frazier Idaho Falls Facility – Model Source Parameters

SOURCE ID	Source Description	Easting (X) (m)	Northing (Y) (m)	Base Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Diameter (m)	TRIMETH (lb/hr)
BLUESTACK	Blue Tank Stack	412743.86	4811709.92	1424.47	11.8872	0	0.001	0.6096	4.43
BIGORANGE	Big Orange Tank Stack	412781.89	4811704.66	1424.47	11.8872	0	0.001	0.6096	4.43
SMORANGE	Small Orange Tank Stack	412778.87	4811691.16	1424.47	11.8872	0	0.001	0.6096	4.43