

Statement of Basis

**Permit to Construct No. P-2012.0021
Project ID 61032**

**Southern Field Welding
Burley, Idaho**

Facility ID 031-00050

Final

July 10, 2012



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Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration

PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Southern Field Welding (SFW) is a small manufacturing facility located in Burley, Idaho. The facility specializes in manufacturing food processing equipment and oil and gas equipment. SFW will also manufacture other miscellaneous pieces of equipment, such as structural steel and custom steel as requested. SFW is comprised of three buildings: the Office/Engineering Building, the Fabrication 1 Building, and the Fabrication 2 Building.

Welding Operations

SFW uses a variety of steel base materials to manufacture the food processing equipment. SFW cuts and welds base materials inside the Fabrication 2 building, with these activities generating fugitive emissions vented out of six vents. Welding emissions are not captured by hoods or special ventilation.

SFW uses the following types of welding:

- Shielded Metal Arc Welding (SMAW)
 - AKA Manual Metal Arc Welding (MMA)
- Gas Metal Arc Welding (GMAW)
 - AKA Metal Inert Gas Welding (MIG)
- Flux Cored Arc Welding (FCAW)
- Gas Tungsten Arc Welding (GTAW)
 - AKA Tungsten Inert Gas Welding (TIG)
- Brazing

Abrasive Blasting and Spray Painting

SFW preps and paints some manufactured equipment. Painting preparation is accomplished using paint strippers and the use of an abrasive blaster. Painting is conducted in an enclosed booth with two exhaust stacks. Particulate from these stacks is controlled by filtration control; which achieves approximately 99% control. Abrasive blasting is also conducted in an enclosed booth, with a single exhaust stack. Particulate from abrasive blasting is controlled by a filter which achieves approximately 91% control.

Paint Booth and Shop, Space Heaters

SFW uses a total of three diesel-fired space heaters to dry equipment after painting. The total rated heat capacity for these heaters is 0.461 MMBtu/hr. Emissions are vented from the same, two exhaust stacks from the painting booth which achieve approximately 99% particulate control. SFW uses a total of five natural-gas fired space heaters at the facility. The total rated heat input capacity is 0.795 MMBtu/hr. Space heater emissions are vented from exhaust vents used to vent welding emissions.

Permitting History

This is the initial PTC for an existing facility that was constructed in 1998, thus there is no permitting history.

Application Scope

This permit is the initial PTC for this facility. The applicant has proposed to install and operate a paint booth, conduct welding operations and perform abrasive blasting.

Application Chronology

April 17, 2012	DEQ received an application and an application fee.
April 27 – May 14, 2012	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
May 17, 2012	DEQ determined that the application was complete.
May 25, 2012	DEQ made available the draft permit and statement of basis for peer and regional office review.
May 29, 2012	DEQ made available the draft permit and statement of basis for applicant review.
July 3, 2012	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment	Emission Point ID No.
<u>Coating Operations:</u> Manufacturer: Graco Model: Ultra MaxII 695	<u>Primary Filtration:</u> Manufacturer: Filtrair Model: FF-560 GX PM ₁₀ control efficiency: 99% 36 in ² (One filter per stack) <u>Secondary Filtration:</u> Manufacturer: EMI Filtration Model: Blue/White Poly Roll FL-1000 PM ₁₀ control efficiency: 91.2% 48 in ² (One filter per stack)	Building Ventilation
<u>Welding Operations</u> Various Welding Rods	None	Building Ventilation
<u>Abrasive Blasting</u> Manufacturer: Marco Model: M-2502.5 Maximum Capacity: 1,685 lb/day	<u>Filtration System:</u> Manufacturer: EMI Filtration Model: Blue/White Poly Roll FL-1000 PM ₁₀ control efficiency: 91.2% 48 in ² (One filter per stack)	Building Ventilation
<u>Paint Booth Space Heaters</u> Manufacturer: Mr. Heater, VAL6 Model: 175KTR, KBE5S Maximum Capacity: 0.461 MMBtu/hr combined	None	
<u>Shop Space Heaters</u> Manufacturer: ADS, Modine Model: SEP Series 175-A, High Efficiency II PDP Maximum Capacity: 0.795 MMBtu/hr combined	None	

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the coating, welding, abrasive blasting and heater operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42, operation of 8,760 hours per year, and process information specific to the facility for this proposed project. Welding operation emission estimates were derived from AP-42, Chapter 12, Section 19. Coating emission estimates are derived from actual usage rates and MSDS information from specific coating products. Particulate emissions from the coatings applied a transfer efficiency of 75% and PM control efficiency 99.91%. This number is a combination of the two filtration systems (91.2% and 99%). A scaling factor of 3.37 was applied to all estimates to maximum emissions to 8,760 hr/yr. Abrasive blast emissions are based on the total amount of shot used and factors from AP-42 Chapter 13, Section 2. Also, the secondary filtration system of 91.2% control was applied. Three diesel-fired space heaters located in the paint booth estimated the emissions using AP-42 Chapter 1, Section 3 and limiting the sulfur content to ultra-low (15 ppm or 0.0015%). Five natural gas space heaters located throughout the facility calculated emission estimates using AP-42 Chapter 1, Section 4. Lastly, greenhouse gas emissions applied global warming potential values from 40 CFR 98, Table A-1, Subpart A.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this all operations, uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8,760 hr/yr (24 hr/day x 365 day/yr). The filtration control efficiency and the transfer efficiency of the spray guns were removed. Note that the total of PM₁₀ reduces to 11.6 T/yr when the transfer efficiency is included.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

	PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC	CO _{2e}
Source	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources						
Coating Operations	28.79	--	--	--	19.6	--
Welding Operations	0.40	--	--	--	--	--
Abrasive Blasting	4.00	--	--	--	--	--
Diesel Space Heaters	0.0151	0.0032	0.3022	0.0756	0.0084	338.34
Natural Gas Heaters	0.0252	0.0020	0.3117	0.1327	0.0182	400.38
Total, Point Sources	33.23	0.01	0.61	0.21	19.63	738.72

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For facility-wide operations, uncontrolled Potential to Emit is based upon a worst-case of 8,760 hr/yr (24 hr/day x 365 day/yr). Then, the worst-case maximum HAP Potential to Emit was determined for the facility. See Appendix A for detailed calculations.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Largest individual HAP (Xylene)	8.43
Facility-Wide Total HAPs	11.95

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

This is an existing facility. However, since this is the first time the facility is receiving a permit, pre-project emissions are set to zero for all criteria pollutants.

Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO _{2e}	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Coating Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting ^c	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Diesel Space Heaters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Heaters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pre-Project Totals	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
- c) For simplicity and consistency with other emission units PM_{2.5} and PM₁₀ are considered equivalent for the abrasive blasting although in the application PM_{2.5} was estimated to be only 74% of PM₁₀. Both estimates are so low that there is no impact by making this assumption.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria and GHG pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5} ^c		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Coating Operations	0.0014	0.006	--	--	--	--	--	--	4.47	19.6	--	--
Welding Operations	0.09	0.40	--	--	--	--	--	--	--	--	--	--
Abrasive Blasting	0.08	0.35	--	--	--	--	--	--	--	--	--	--
Diesel Space Heaters	3.04E-06	1.33E-05	0.0007	0.0032	0.069	0.3022	0.0173	0.0756	0.002	0.0084	77.25	338.34
Natural Gas Heaters	0.006	0.0252	0.0005	0.0020	0.071	0.3117	0.0303	0.1327	0.004	0.0182	91.41	400.38
Post Project Totals	0.18	0.78	0.001	0.01	0.14	0.61	0.05	0.21	4.48	19.7	168.66	738.72

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
- c) For simplicity and consistency with other emission units PM_{2.5} and PM₁₀ are considered equivalent for the abrasive blasting although in the application PM_{2.5} was estimated to be only 74% of PM₁₀. Both estimates are so low that there is no impact by making this assumption.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post Project Potential to Emit	0.18	0.78	0.001	0.01	0.14	0.61	0.05	0.21	4.47	19.70	168.66	738.72
Changes in Potential to Emit	0.18	0.78	0.001	0.01	0.14	0.61	0.05	0.21	4.47	19.70	168.66	738.72

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Methyl Chloroform	0.00E-03	8.1E-07	8.1E-07	127	No
Acetone	0.00E-03	0.7142	0.7142	119	No
Chromium III	0.00E-03	5.09E-05	5.09E-05	0.033	No
Cobalt	0.00E-03	6.62E-06	6.62E-06	3.0E-03	No
Copper	0.00E-03	6.46E-07	6.46E-07	1.0E-02	No
Manganese	0.00E-03	4.82E-03	4.82E-03	3.0E-01	No
Barium	0.00E-03	3.33E-06	3.33E-06	3.3E-02	No
Molybdenum	0.00E-03	8.33E-07	8.33E-07	3.0E-01	No
Methyl Ethyl Ketone	0.00E-03	3.0158	3.0158	39.3	No
Hexane	0.00E-03	1.4E-03	1.4E-03	12	No
Pentane	0.00E-03	8.6E-03	8.6E-03	118	No
Silica	0.00E-03	1.0E-04	1.0E-04	0.667	No
Toluene	0.00E-03	2.8776	2.8776	25	No
VM&P Naphtha	0.00E-03	1.629	1.629	91.3	No
Xylene	0.00E-03	4.5985	4.5985	29	No
Mica	0.00E-03	5.0E-04	5.04E-04	0.2	No
Methanol	0.00E-03	0.2383	0.2383	17.3	No
Ethylene Glycol Monobutyl Ether	0.00E-03	0.4806	0.486	8	No
Selenium	0.00E-03	2.43E-08	2.43E-08	1.0E-02	No
Vanadium	0.00E-03	1.74E-06	1.74E-06	3.0E-03	No
Zinc	0.00E-03	2.20E-05	2.20E-05	7.0E-01	No

None of the PTEs for non-carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 8 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Formaldehyde	0.00E-03	1.71E-04	1.71E-04	5.1E-04	No
Arsenic	0.00E-03	1.53E-07	1.53E-07	1.5E-06	No
Beryllium	0.00E-03	1.03E-08	1.03E-08	2.8E-05	No
Cadmium	0.00E-03	8.34E-07	8.34E-07	3.7E-06	No
Chromium VI	0.00E-03	2.58E-05	2.58E-05	6.0E-07	Yes
Nickel	0.00E-03	2.70E-05	2.70E-05	3.0E-05	No
POM	0.00E-03	4.89E-08	4.89E-08	9.1E-05	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

Chromium (VI) exceeded the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586. However, modeling not required because the welding operations of the facility is subject to 40 CFR 63, Subpart XXXXXX requirements and chromium (VI) is one of the metal fabrication and finishing HAP that is regulated by the subpart. Therefore, in accordance with IDAPA 58.01.01.210.20(a), any TAPs that are regulated by a NSPS, NESHAP or MACT does not require any further assessment. It is assumed that the requirements of the subpart are sufficient to meet air quality standards.

Ambient Air Quality Impact Analyses

No ambient air quality impact analysis was conducted for this project. All pollutants were below the Level II modeling threshold, while PM_{2.5} did exceed Level I modeling thresholds. The modeling Level I exemptions are based on the PM_{2.5} significance impact level (SIL), which are 1.2 µg/m³ for the 24-hr average and 0.3 µg/m³ for the annual average. The Level I de minimis emission rates were established at 0.054 lb/hr and 0.35 T/yr of PM_{2.5}.

Twin Falls PM_{2.5} background concentrations were 20.3 µg/m³, 24hr average and 6.74 µg/m³, annual average. These backgrounds were subtracted from the NAAQS to determine the allowable ambient impact of the facility to provide allowable facility-wide impacts of 14.7 µg/m³, 24hr average and 8.6 µg/m³ annual average.

Relating the Level I emission rates and SILs to the unknown allowable emission rates and allowable facility wide impacts lets you estimate the unknown allowable emission rate.

$$0.054 \text{ lb/hr} = X \text{ lb/hr}$$

$$1.2 \text{ } \mu\text{g/m}^3, \text{ 24hr average} \quad 14.7 \text{ } \mu\text{g/m}^3, \text{ 24hr average}$$

X = 0.66 lb/hr at the NAAQS. Therefore, the estimated facility-wide daily PTE of PM_{2.5} of 0.16 lb/hr is approximately 25% of the standard.

The corresponding allowable annual impact, following the same method in units of T/yr, is 10 T/yr PM_{2.5}. The facility-wide potential PM_{2.5} emission rate is 3.5% of the screening approach’s allowable ambient impact.

The 0.054 lb/hr and 0.35 T/yr of PM_{2.5} Level I exemption emission rates were based AERSCREEN modeling using favorable exhaust parameters and distance to the ambient air boundary. Due to the fact that not all emissions would be coming from a single point in the facility and it is fairly safe to assume the emissions will be spread out among the various emission points the impacts shouldn’t become overly concentrated in that corridor shared by the Southern Field welding and it neighbor to the north to the extent NAAQS compliance would be jeopardized. (between adjacent buildings).

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Cassia County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

“Synthetic Minor” classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for criteria pollutants to the Major Source thresholds to determine if the facility will be “Synthetic Minor.”

Table 9 UNCONTROLLED PTE AND PTE FOR REGULATED AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

Pollutant	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	Uncontrolled PTE Exceeds the Major Source Threshold and PTE Exceeds the Major Source Threshold?
PM ₁₀ /PM _{2.5}	33.23	0.78	100	No
SO ₂	0.01	0.01	100	No
NO _x	0.61	0.61	100	No
CO	0.21	0.21	100	No
VOC	19.7	19.7	100	No
CO ₂ e	738.7	738.7	100,000	No

“Synthetic Minor” classification for HAP pollutants is defined as the uncontrolled Potential to Emit for HAP pollutants are above the applicable major source thresholds and the Potential to Emit for HAP pollutants fall below the applicable major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for HAP pollutants to the Major Source thresholds to determine if the facility will be “Synthetic Minor.”

Table 10 UNCONTROLLED PTE AND PTE FOR HAZARDOUS AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

HAP Pollutant ^a	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	Uncontrolled PTE Exceeds the Major Source Threshold and PTE Exceeds the Major Source Threshold?
1,1,1-Trichloroethane	3.6E-06	3.6E-06	10	No
Aromatic Hydrocarbon	8.1283	0.4952	10	No
Chromium III	2.23E-04	3.14E-07	10	No
Chrysene	4.19E-08	4.19E-08	10	No
Formaldehyde	7.0E-04	7.0E-04	10	No
Hexane	6.0E-03	6.0E-03	10	No
Toluene	12.6038	1.8425	10	No
Xylene	20.1414	8.4313	10	No
Methanol	3.9006	1.1787	10	No
Arsenic	6.7E-07	6.70E-07	10	No
Beryllium	4.51E-08	4.51E-08	10	No
Cadmium	3.65E-06	3.65E-06	10	No
Chromium VI	1.13E-04	8.74E-08	10	No
Cobalt	2.90E-05	4.03E-07	10	No
Manganese	2.11E-02	2.83E-06	10	No
Mercury	6.04E-02	6.04E-02	10	No
Nickel	1.18E-04	7.40E-06	10	No
Selenium	1.06E-07	1.06E-07	10	No
Total	45.00	11.95	25	No

a. The facility stated that Methyl Ethyl Ketone (MEK) was a HAP. However, as of December 19, 2005 it has been delisted by the EPA. This reduces the overall uncontrolled PTE HAPs by 13.2091 T/yr and PTE by 1.7969 T/yr, respectively. Please see the Federal Register, 70 FR 75047 for further details.

As demonstrated in Table 9, the facility has an uncontrolled potential to emit for PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and VOC emissions are less than the Major Source thresholds of 100 T/yr for each pollutant. In addition, as demonstrated in Table 10 the facility has controlled potential HAP emissions of less than the Major Source threshold of 10 T/yr and for all HAP combined less than the Major Source threshold of 25 T/yr. Therefore, this facility is not designated as a Synthetic Minor facility.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed new emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400-410 were not applicable to this permitting action.

Other Rules as Applicable (IDAPA 58.01.01.776)

IDAPA 58.01.01.776 Control of Odors

Section 776.01 states that no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution. These requirements are assured by Permit Conditions 2.4 and 2.10.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of opacity emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is included as Permit Condition 2.3.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for any criteria pollutant or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart XXXXXX–National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication & Finishing Source Categories. Two other subparts, MMMM and HHHHHH were also evaluated for applicability.

40 CFR 63, Subpart MMMM..... National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

§ 60.3880.....What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§ 60.3881.....Am I Subject to this subpart?

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.3981 in determining whether you use 946 liters (250 gal) per year, or more, of coatings in the surface coating of miscellaneous metal parts and products.

The permittee, SFW, is not a major source for HAPs. Therefore, this subpart does not apply.

**40 CFR 63, Subpart HHHHHH.....National Emission Standards for Hazardous Air Pollutants:
Paint Stripping and Miscellaneous Surface Coating
Operations at Area Sources**

§ 63.11169.....What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

SFW does not perform paint stripping using products that contain methylene chloride. Nor do they perform auto body refinishing. Finally, none of the coatings or other products used by SFW contains any of the target HAPs indicated above. Therefore, this subpart does not apply.

**40 CFR 63, Subpart XXXXXX..... National Emission Standards for Hazardous Air Pollutants
Area Source Standards for Nine Metal Fabrication &
Finishing Source Categories**

§ 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?"

(6) Industrial Machinery and Equipment Finishing Operations;

SFW is primarily engaged in Industrial machinery and both the NAICS and SIC codes of the facility indicate that they are subject to the subpart. According to the EPA, there are specific industrial codes that a facility must have to be subject to XXXXXX.

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.

SFW uses the abrasive material SHARPSHOT[®] manufactured by Minerals Research & Recovery, Inc. It does contain nickel and cadmium (III) at greater than 0.1% by weight. Therefore, the dry abrasive blasting operations are considered an affected source.

(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.

Machining operations are also performed that contain MFHAP as defined by the subpart. Thus, SFW is also a machining affected source.

(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.

SFW doesn't perform grinding or polishing with machines that use MFHAP-containing material. Therefore, SFW is not an affected source regarding grinding and dry polishing.

(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."

According to MSDS sheets, they are no MFHAPs within any of the coatings used by SFW. Therefore, there are no provisions involving coating that applies to SFW.

(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.

The welding operations contain MFHAP and are therefore considered an affected source as well.

(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.

SFW was constructed prior to April 3, 2008 and is considered an existing affected source.

§ 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.

SFW is an existing sources and should have been operating in compliance of the subpart as of July, 25, 2011. The facility must be in compliance currently and at permit issuance going forward.

(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.

SFW is not considered a new source. Therefore, this requirement does not apply.

§ 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.

The area in which dry abrasive blasting is performed by SFW does not occur in a building or enclosure that is fully closed and unvented. Therefore, the requirements do not apply.

(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.

SFW captures emissions from abrasive blasting and vents them through a filtration system. Therefore, all the requirements of this section are applicable. These are ensured by Permit Condition 3.1.

(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 fence line 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."

Some welding operations may result in objects greater than 8 feet in any one dimension. When those circumstances arise, specific requirements are triggered. These are also ensured by Permit Condition 3.1.

(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.

SFW must comply with machining standards as stated in the subpart. This requirement is ensured by Permit Condition 3.2.

(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.

SFW does not perform dry grinding and polishing with machines using materials containing MFHAP. Thus, this section is not applicable.

(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.

This section of the subpart is not currently applicable as there are no paints currently used that contain MFHAP. If, in the future, paint composition changes to incorporate any MFHAP, this section would become applicable.

(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.

The applicable requirements from 40 CFR 63.11516(f) and 40 CFR 63.11516(f)(2) are addressed in Permit Conditions 3.3.1 and 3.3.3.

(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 exceedence;

(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."

In the event, SFW uses greater than 2,000 pounds of welding rod per year sections 3 through 8 apply. Permit Conditions 3.3.4-3.3.11 account for all requirements.

§ 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.

Depending on the frequency of the visibility of fugitive emissions dictates how often Method 22 testing is required. Permit Condition 3.4 ensures that all requirements are being met.

(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.

The welding operations are subject to opacity standards as defined in the subpart. SFW has used greater than 2,000 pounds of wire in the last year and must comply. The graduated testing is similar to Permit Condition 3.4. P.C. 3.5 ensures all welding visible emission requirements are met.

§ 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.

The Initial Notification date of July 25, 2011 has passed. SFW did not submit the notification on time. The permit includes this as a requirement and the expectation is that SFW will submit the proper notification to the Administrator as soon as possible.

(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.

The Compliance Status notification has also not been submitted within the required time period. However, SFW states the notification will be submitted in a timely manner. This requirement is ensured in Permit Condition 3.8.2. Please note that the information required in 40 CFR 63.11516(e)(3)(vi)(C) or 63.11516(e)(4)(ix)(C) are not included because they pertain to the spray coating which is not applicable at this time.

(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.

The report requirements of the subpart are ensured by Permit Conditions 3.8.3-3.8.4.

(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 exceedences of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedences 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.

SFW is not a Title V facility. Therefore, this section of the subpart does not apply.

(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.

These general requirements are ensured by Permit Condition 3.8.5.

(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.

These visual determination requirements are ensured by Permit Conditions 3.8.6-3.8.7.

(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.

Should there be any exceedences of 20% opacity these occurrences need to be included in the compliance report. This is ensured by Permit Condition 3.9.

(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.

Ensured by Permit Condition 3.9.

(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?"*

Permit Condition 3.6 ensures all the necessary general records that must be maintained.

(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.

Spray painting is not currently an affected source. Therefore, these recordkeeping requirements do not apply.

(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.

All welding specific recordkeeping requirements are ensure in Permit Condition 3.7.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Initial Permit Condition 2.1 – 2.2

These two conditions provide a process description of the facility. This includes the type of operations performed by SFW and all the emission units on site. PC 2.2 is a table that describes all the specifications of each emission unit and corresponding control device, where applicable.

Emission Limits

Initial Permit Condition 2.3

This condition ensures the opacity limit does not exceed 20%. It should be noted that there no numerical emission limits either on a unit-by-unit basis or facility-wide because all estimates were based on continual operations of 8,760 hr/yr. There are several operational limits such as amount of available coating or welding rod. These conditions indirectly limited the emissions. Also, the only post-project PTE of any consequence was VOC at 19.7 T/yr. As long as SFW is complying with Permit Conditions 2.8, 2.9, 2.11 and 2.14, that value will never be exceeded. Additionally, that amount is so far from any major threshold concern that requiring more recordkeeping to demonstrate compliance with that value seems unnecessary.

Initial Permit Condition 2.4

This condition ensures that odors are mitigated as much as possible in accordance with IDAPA 58.01.01.776.01.

Operating Requirements

Initial Permit Condition 2.5

This condition limits the heaters at the facility to specific fuels. As requested by the permittee, all paint booth heaters may only burn #2 distillate fuel, while all other heaters (5) may only combust natural gas.

Initial Permit Condition 2.6

SFW is limited to specific welding rod types as stated in the application and the total amount of wire used is indicated to ensure emission estimates are correct.

Initial Permit Condition 2.7

This condition limits the total annual amount of abrasive blasting material to 614, 884 lb. This limit ensures that all blasting emission estimates are not exceeded.

Initial Permit Condition 2.8

This condition provides an aggregated daily coating usage limit and an individualized annual limit on per coating basis. The individualized limits were included to ensure that the facility does not exceed the major source HAP thresholds of 10 T/yr and 25 T/yr. The daily limit is the maximum amount of coating that may be sprayed in one 24 hour period. All state regulated TAPs were evaluated on a 24-hr basis (including 586 pollutants) for conservatism. No screening emission levels at 24-hr averages were exceeded. Therefore, any of the allowable coatings may be used on a daily basis combined to 25.6 gallons. However, some of the products have much lower annual limits that will dictate its use. Finally, the equivalent option allows for the replacing of products if VOC, HAP and TAP content is not increased.

Initial Permit Condition 2.9

This condition was added to ensure that all spray operations were conducted within a booth with a filtration system.

Monitoring and Recordkeeping Requirements

Initial Permit Condition 2.10

Odor complaints must be handled in a proper manner with adequate recordkeeping outlining the corrective action that was taken.

Initial Permit Condition 2.11

To maintain accuracy of the emissions associating with spray coating all purchase records and MSDS sheets need to be kept.

Initial Permit Condition 2.12

This condition requires that proper records be maintained to demonstrate compliance with the Welding Wire Usage permit condition.

Initial Permit Condition 2.13

This condition requires that proper records be maintained to demonstrate compliance with the Abrasive Blasting Usage permit condition.

Initial Permit Condition 2.14

Proper daily and monthly records of product usage must be documented to demonstrate compliance with the Enamel, Thinner, Primer, and Coating use Limit permit condition.

Initial Permit Condition 2.15

This condition was added to indicate that should there be any conflict between the requirements of 40 CFR 63, Subpart XXXXXX as stated in the permit and the federal regulation, the federal code applies.

Subpart XXXXXX Requirements

Initial Permit Condition 3.1

This condition provides general standards and management practices SFW must adhere to.

Initial Permit Condition 3.2

This condition provides machining management requirements SFW must adhere to.

Initial Permit Condition 3.3

This condition provides welding standards and management practices SFW must adhere to.

Initial Permit Condition 3.4

This condition provides general visible emission monitoring requirements SFW must adhere to.

Initial Permit Condition 3.5

This condition provides welding visible emission monitoring requirements SFW must adhere to.

Initial Permit Condition 3.6

This condition provides general recordkeeping requirements SFW must adhere to.

Initial Permit Condition 3.7

This condition provides welding recordkeeping requirements SFW must adhere to.

Initial Permit Condition 3.8

This condition provides general notification requirements SFW must adhere to.

Initial Permit Condition 3.9

This condition provides welding notification requirements SFW must adhere to.

General Provisions

Initial Permit Condition 4.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 4.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 4.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 4.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 4.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 4.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 4.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 4.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 4.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 4.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 4.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 4.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 4.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 4.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 4.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 4.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

Southern Field Welding
Criteria Pollutant Maximum PTE With Existing Controls

Activity/Source	Maximum Annual Potential to Emit																			
	NOX T/yr	NOX (lb/hr)	SO2 T/yr	SO2 (lb/hr)	CO T/yr	CO (lb/hr)	VOC T/yr	VOC (lb/hr)	Pb T/yr	Pb (lb/hr)	Pb (lb/month)	PM T/yr	PM (lb/hr)	PM10 T/yr	PM10 (lb/hr)	PM2.5 T/yr	PM2.5 (lb/hr)	CO2e T/yr	CO2 (lb/hr)	
Point Source or Fugitive																				
Point	-	-	-	-	-	-	13.58	4.5	-	-	-	-	-	0.006	0.005	0.006	0.005	-	-	
Fugitive	-	-	-	-	-	-	-	-	1.3E-06	2.95E-07	0.0002	-	-	0.397	0.0907	0.397	0.0907	-	-	
Point	0.30	0.069	0.0032	0.000735	0.076	0.01725	0.008402	0.001918	1.6E-08	3.65112E-09	0.000	0.00	1.00188E-05	0.00	0.080	0.26	0.059	-	-	
Fugitive	0.312	0.071	0.002	0.00005	0.133	0.030	0.018	0.004	1.66E-06	3.79E-07	0.000	0.03	0.005754286	0.03	0.005754286	0.025	0.005754286	338.3	77.2	
Point																		400.4	91.4	
Totals:																				
Above 100 tpy Threshold for Criteria Pollutants?	0.614	0.140	0.005	0.001	0.208	0.046	19.608	4.477	0.000	0.000	0.000	2.487	0.568	0.781	0.182	0.686	0.160	736.712	168.656	
IDAPA 58.01.006.106 Significant Emission Rates:	40	9.1	40.0	9.1	100	22.81	40	9.1	0.6	0.6	-	25	-	15	3.4	10	2.3	-	-	
Above SER Threshold:	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	-	-
IDAPA 58.01.006.106 Significant Emission Rates Below Regulatory Concern:	4	-	4	-	10	-	4	-	0.06	-	-	2.5	-	1.5	-	1.0	-	-	-	-
Above SER Threshold:	No	-	No	-	No	-	Yes	-	No	-	-	No	-	No	-	No	-	-	-	-
Level I Modeling Threshold:	1.2	0.2	1.2	0.21	-	15	-	-	-	-	14	-	-	-	0.22	0.35	0.054	-	-	-
Above Level I Modeling Threshold:	No	No	No	No	-	No	-	-	-	-	No	-	-	-	No	Yes	Yes	-	-	-
Level II Modeling Threshold:	14	2.4	14	2.5	-	175	-	-	-	-	14	-	-	-	2.6	4.1	0.63	-	-	-
Above Level II Modeling Threshold:	No	No	No	No	-	No	-	-	-	-	No	-	-	-	No	No	No	-	-	-
Idaho Air Rules Section 006 Modeling Threshold:	40	9.1	40	9.1	100	28.1	40	9.1	-	-	-	-	-	15	3.4	10	2.3	-	-	-
Above Section 006 Modeling Threshold:	No	No	No	No	No	No	No	No	-	-	-	-	-	No	No	No	No	-	-	-

**Southern Field Welding
Criteria Pollutant Maximum PTE With Existing Controls**

POTENTIAL TO EMIT FOR NSR REGULATED POLLUTANTS

Emissions Unit	Point or Fugitive	NOX T/yr	SO2 T/yr	CO T/yr	VOC T/yr	Pb T/yr	PM T/yr	PM10 T/yr	PM2.5 T/yr	CO2e T/yr	GHG Mass T/yr
Paint Booth	Point	-	-	-	19.58	-	-	0.01	0.006	-	-
Welding Operations	Fugitive	-	-	-	-	1.29E-06	-	0.4	0.397	-	-
Abrasive Blasting	Point	-	-	-	-	-	2.462	0.35	0.257	-	-
Paint Booth Space Heaters	Fugitive	0.30222	0.003219	0.07556	0.008	1.6E-08	4E-05	0	1E-05	338.34	336.97996
Shop Space Heaters	Point	0.311730857	0.00199	0.13265	0.018	1.66E-06	0.025	0.03	0.025	400.38	397.96921
Totals		0.614	0.005	0.208	19.608	0.000	2.487	0.781	0.686	738.712	734.949

Notes:

Although SFW's operations are not one of the 28 listed source categories for Inclusion of Fugitive Emissions, the fugitive sources are noted here for informational purposes.

Southern Field Welding

Toxic Air Pollutants and HAPs Summary Information

CAS#	CAS# (No Hyphen)	Toxic Air Pollutant	Sources	Maximum Emission Rate (lb/hr)	Maximum Emission Rate (t/yr)	Idle Air Quality Rules Emission Rate Threshold	Below IDAPA Section 5.02 or 5.06 CRAs?	Level of Regulatory Concern	Below Level of Regulatory Concern?	HAP	PAH/POHM ⁶	Listed in 40 CFR Part 99 Table A-1 (GHW)
71-55-6	71556	1,1,1-Trichloroethane (aka Methyl Chloroform)	Paint Booth Space Heaters	8.1E-07	3.6E-06	127	Yes	12.7	Yes	No	No	No
25551-13-7	2551137	1,2,4-TMB	Paint Booth	0.0000	0.0000	8.2	Yes	0.82	Yes	No	No	No
91-57-6	91576	2-Methylnaphthalene	Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
56-49-5	56495	2-Methylthiophene	Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
67-64-1	67641	7,12-Dimethylbenz(a)anthracene	Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
83-32-9	83329	Acenaphthene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
208-26-6	208266	Acenaphthylene	Paint Booth Space Heaters	0.0000	0.0000		Yes	0.00E+00	Yes	No	No	No
7429-90-5	7429905	aluminum (particulate)	Paint Booth	0.0000	0.0000	0.967	Yes	0.0667	Yes	Yes	No	No
508-93-7	508937	Amly acetate	Paint Booth	0.0000	0.0000	35.3	Yes	3.53	Yes	No	No	No
130-18-7	130187	Anthracene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
64742-95-6	64742956	Aromatic hydrocarbon	Paint Booth	0.1131	0.4952					Yes	No ^a	No
7440-39-3	7440393	antimony and compounds (particulate)	Paint Booth	0.0000	0.0000	0.033	Yes	0.033	Yes	Yes	No	No
7440-39-3	7440393	barium (soluble compounds) (particulate)	Paint Booth	0.0000	0.0000	0.033	Yes	0.033	Yes	Yes	No	No
71-43-2	71432	Benzene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	8.00E-04	Yes	0.00008	Yes	Yes	No	No
56-55-3	56553	benzo(a)anthracene ^b	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	8.10E-05	Yes	0.0000091	Yes	Yes	No	No
205-93-2, 205-87-3	205992, 205873	benzo(a)fluoranthene ^b	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	8.10E-06	Yes	0.0000091	Yes	Yes	Yes	No
191-24-2	191242	benzo(a,h)perylene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	No	No
50-32-8	50328	benzo(a)pyrene ^b	Shop Space Heaters	0.0000	0.0000	8.10E-05	Yes	0.0000091	Yes	Yes	No	No
113-86-4	113864	butyl acetate	Paint Booth	0.0000	0.0000	47.3	Yes	4.73	Yes	No	No	No
109-67-8	109678	Butane	Shop Space Heaters	0.0016	0.0070					Yes	No	No
1333-86-4	1333864	Carbon black (particulate)	Paint Booth	0.0000	0.0000	0.23	Yes	0.023	Yes	No	No	No
7440-47-3	7440473	chromium III (particulate)	Paint Booth, Welding, Shop Space Heaters, Paint Booth Space Heaters	7.18E-08	3.14E-07	0.033	Yes	0.0033	Yes	Yes	No	No
218-01-9	218019	Chrysene ^b	Paint Booth Space Heaters, Shop Space Heaters	9.57E-09	4.19E-08	8.10E-05	Yes	0.0000091	Yes	Yes	Yes	No
110-83-7	110837	Cyclohexane	Paint Booth	0.0000	0.0000	70	Yes	7	Yes	No	No	No
51-76-3	51763	Dibenz(a,h)anthracene ^b	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	9.10E-06	Yes	0.0000091	Yes	Yes	Yes	No
25321-22-6	25321226	Dichlorobenzene	Shop Space Heaters	0.0000	0.0000	0.00E+00	Yes	0	Yes	Yes	No	No
74-84-0	74840	Ethane	Shop Space Heaters	0.0023	0.0109					Yes	No	No
763-39-9	763399	ethyl 3-ethoxy propionate	Paint Booth	0.0000	0.0000					Yes	No	No
141-78-6	141786	ethyl acetate	Paint Booth	0.0000	0.0000	93.3	Yes	9.33	Yes	No	No	No
64-17-5	64175	ethyl alcohol	Paint Booth	0.0000	0.0000	125	Yes	12.5	Yes	No	No	No
100-41-4	100414	ethyl benzene	Paint Booth, Paint Booth Space Heaters	0.0000	0.0000	29	Yes	2.9	Yes	Yes	No	No
110-49-6	110496	ethylene glycol monobutyl ether acetate	Paint Booth	0.0000	0.0000	1.6	Yes	0.16	Yes	Yes	No	No
205-44-0	205440	Fluoranthene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	Yes ^a	No
86-73-7	86737	Fluorene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	Yes ^a	No
50-00-0	50000	Formaldehyde	Paint Booth Space Heaters, Shop Space Heaters	1.71E-04	0.0007	5.10E-04	Yes	0.000051	No	Yes	No	No
141-83-5	141835	hexane	Paint Booth	0.0000	0.0000	109	Yes	10.9	Yes	No	No	No
822-06-0	822060	hexamethylene diisocyanate	Paint Booth	0.0000	0.0000	0.007	Yes	0.0007	Yes	Yes	No	No
193-39-5	193395	Indol(1,2,3-cd)pyrene ^b	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	5.10E-06	Yes	0.0000091	Yes	Yes	No	No
4098-71-9	4098719	isophorone diisocyanate	Paint Booth	0.0000	0.0000	0.006	Yes	0.0006	Yes	No	Yes	No
67-83-0	67830	isopropyl alcohol	Paint Booth	0.0000	0.0000	65.3	Yes	6.53	Yes	No	No	No
110-43-0	110430	methyl amyl ketone	Paint Booth	0.0000	0.0000	16.7	Yes	1.67	Yes	No	No	No
78-93-3	78933	MEK	Paint Booth	0.1193	0.7499	36.3	Yes	3.63	Yes	Yes	No	No
108-10-1	108101	Methyl Isobutyl Ketone (MIBK) (HAP)	Paint Booth	0.0000	0.0000	13.7	Yes	1.37	Yes	Yes	No	No
328-87-9	328879	mineral spirits	Paint Booth	0.5189	2.2728	NA	Yes	NA	Yes	Yes	No	No
328-87-9	328879	OCG ³	Paint Booth Space Heaters	0.0000	0.0000	1.50E+10	Yes	NA	Yes	No	No	No
713-36-2	713362	n-butyl alcohol	Paint Booth	0.0000	0.0000	10	Yes	1	Yes	No	No	No
110-54-3	110543	n-hexane	Shop Space Heaters	0.0044	0.0069	12	Yes	1.2	Yes	Yes	No	No
91-20-3	91203	naphthalene	Paint Booth, Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000	3.33	Yes	0.333	Yes	Yes	No	No
109-69-0	109690	Naphthalene	Shop Space Heaters	0.0020	0.0086	118	Yes	11.8	Yes	No	No	No
85-01-8	85018	Phenolphthalein	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
7664-38-2	7664382	phosphoric acid	Paint Booth	0.0000	0.0000	0.007	Yes	0.0007	Yes	No	No	No
74-98-6	74986	Propane	Shop Space Heaters	0.0011	0.0053					Yes	No	No
79-09-4	79094	propionic acid	Paint Booth	0.0000	0.0000	2	Yes	0.2	Yes	No	No	No
107-98-2	107982	propylene glycol monomethyl ether acetate	Paint Booth	0.0000	0.0000	24	Yes	2.4	Yes	No	No	No
119-20-0	119200	Pyrene	Paint Booth Space Heaters, Shop Space Heaters	0.0000	0.0000					Yes	No ^a	No
61780-53-2	61780532	silica (particulate)	Paint Booth	0.0000	0.0001	0.067	Yes	0.0667	Yes	Yes	No	No
108-88-3	108883	toluene	Paint Booth, Paint Booth Space Heaters, Shop Space Heaters	0.4207	1.8425	25	Yes	2.5	Yes	Yes	No	No
803-23-4	803234	1-Methyl naphtha	Paint Booth	0.3411	0.6181	91.3	Yes	9.13	Yes	No	No	No
1330-20-7	1330207	xylene	Paint Booth, Paint Booth Space Heaters	1.9250	8.4313	29	Yes	2.9	Yes	Yes	No	No
25068-38-6	25068386	Epoxy Resin	Paint Booth	1.0997	4.4234					Yes	No	No
13001-26-2	13001262	Mica	Paint Booth	0.0001	0.0003	0.2	Yes	0.02	Yes	No	No	No
68699-97-2	6869972	Allyl Chloride Ether	Paint Booth	0.2330	1.0206					Yes	No	No
13463-97-7	13463977	Titanium Dioxide	Paint Booth	0.0777	0.3402					Yes	No	No
68082-29-1	68082291	Polymer of C-18 Unsaturated Fatty Acid	Paint Booth	0.1935	0.7459					Yes	No	No
112-24-3	112243	Tetrahydrofuran	Paint Booth	0.0817	0.3580					Yes	No	No
28182-81-2	28182812	Hexam, 1,6-Diisocyanato, Homopolymer	Paint Booth	0.1148	1.3787					Yes	No	No
67-58-1	67581	Methyl Alcohol	Paint Booth	0.2891	1.1787	17.3	Yes	1.73	Yes	Yes	No	No
111-76-2	111762	ethylene glycol monobutyl ether	Paint Booth	0.0286	0.1253	8	Yes	0.8	Yes	No	No	No
7440-38-2	7440382	Arsenic (As)	Shop Space Heaters, Paint Booth Space Heaters	1.93E-07	6.70E-07	1.50E-06	Yes	1.50E-07	Yes	Yes	No	No
7440-39-3	7440393	Barium (Ba)	Shop Heaters	3.33E-08	1.45E-05	3.30E-02	Yes	3.30E-03	Yes	Yes	No	No
7440-41-7	7440417	Beryllium (Be)	Shop Space Heaters, Paint Booth Space Heaters	1.05E-08	4.51E-08	2.80E-05	Yes	2.80E-06	Yes	Yes	No	No
7440-43-9	7440439	Cadmium (Cd)	Shop Space Heaters, Paint Booth Space Heaters	8.24E-07	3.65E-06	3.70E-06	Yes	3.70E-07	Yes	Yes	No	No
7440-47-3	7440473	Chromium (Cr VI)	Welding, Shop Heaters	2.00E-08	8.74E-08	6E-07	Yes	5.80E-08	Yes	Yes	No	No
7440-48-4	7440484	Cobalt (Co)	Welding, Shop Heaters	8.25E-08	4.09E-07	3E-08	Yes	3.00E-09	Yes	Yes	No	No
7440-50-8	7440508	Copper (Cu)	Shop Space Heaters, Paint Booth Space Heaters	6.66E-07	2.83E-06	1E-02	Yes	3.33E-03	Yes	Yes	No	No
7439-96-5	7439965	Manganese (Mn)	Welding, Shop Space Heaters, Paint Booth Space Heaters	1.76E-05	7.69E-05	3E-01	Yes	3.33E-02	Yes	Yes	No	No
7439-97-6	7439976	Mercury (Hg)	Shop Space Heaters, Paint Booth Space Heaters	1.38E-02	6.92E-05	2.5E+01	Yes	2.50E+00	Yes	Yes	No	No
7439-98-7	7439987	Niobium (Nb)	Shop Heaters	8.33E-07	3.65E-06	3E-01	Yes	3.33E-02	Yes	Yes	No	No
7440-01-0	7440010	Nickel (Ni)	Welding, Shop Space Heaters, Paint Booth Space Heaters	1.99E-06	7.40E-06	3E-05	Yes	2.70E-06	Yes	Yes	No	No
7782-49-2	7782492	Selenium (Se)	Shop Space Heaters, Paint Booth Space Heaters	2.43E-08	1.05E-07	1E-02	Yes	1.30E-03	Yes	Yes	No	No
7440-62-2	7440622	Vanadium (V)	Shop Heaters	1.74E-06	7.63E-06	3E-03	Yes	3.00E-04	Yes	Yes	No	No
7440-66-6	7440666	Zinc (Zn)	Shop Space Heaters, Paint Booth Space Heaters	2.20E-05	9.62E-05	7E-01	Yes	6.67E-02	Yes	No	No	No

Total PAH/POHMs	
lbs/hr	4.89E-08
Tons/year	2.14E-07
IDAPA Threshold (lbs/hr)	0.000091
Meets Threshold	Yes

Total HAPs	
lbs/hr	3.15
Tons/year	13.75
Below 2.5 tpy total:	Yes
Max Single HAP:	Xylene
Max Single HAP Emissions (t/yr):	8.43
Meets Less than 2.5 tpy for any single HAP?	Yes

Notes

¹ Hg standard is in lbs/yr.

PAH/POHM for comparison to emission threshold in IDAPA 58.01.01.586. Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

² Used Emission level of 2,3,7,8 - TCDF for screening.

³ Not equivalent to listed PAH/POHM mixtures in IDAPA 58.01.01.586

Southern Field Welding

Welding Emissions

Actual Hours of Operation: 2600
 Potential Hours of Operation: 8760
 Calculated Scaling Factor: 3.369

Type of Welding ¹	Welding Rod Name/Model	Type of Electrode from AP-42 Chapter 12.19	Emission Factor (lb-PM10/1000 lb-electrode)	2011 Annual Use Rates (lb/yr)	Actual Annual PM10 Emissions (lb-PM10/yr)	Scaling Factor to Calculate Maximum PTE	Maximum Electrode Use (lb/year)	Maximum PM10 Emission Rate (lb PM10/yr)	Maximum PM10 Emission Rate (lb PM10/hr)	Maximum PM10 Emission Rate (tons PM10/yr)	Maximum PM2.5 Emission Rate (tons PM2.5/yr) ²
SMAW	LINCOLN 308L-V3/32X8	E308	10.8	16	0.1728	3.369	53.9	0.58220308	0.00007	0.000291102	0.000291102
SMAW	LINCOLN Escalibur 309 SS	E310 ²	15.1	8	0.1208	3.369	27.0	0.40700308	0.00005	0.000203502	0.000203502
SMAW	LINCOLN 309-V1/8X8	E310 ²	15.1	8	0.1208	3.369	27.0	0.40700308	0.00005	0.000203502	0.000203502
SMAW	LINCOLN 309/309L-V MR 1/8X12	E310 ²	15.1	8	0.1208	3.369	27.0	0.40700308	0.00005	0.000203502	0.000203502
SMAW	LINCOLN 309/309L-V3/32X12	E310 ²	15.1	8	0.1208	3.369	27.0	0.40700308	0.00005	0.000203502	0.000203502
SMAW	LINCOLN EXCAL1/8 7018	E7018	18.4	1400	25.76	3.369	4716.0	71.2929231	0.00814	0.035646462	0.035646462
SMAW	LINCOLN EXCAL3/32 7018	E7018	18.4	900	23.04	3.369	3032.3	46.7913846	0.00991	0.043395697	0.043395697
SMAW	LINCOLN FW5P-1/8 6010	E6010	25.6	350	8.96	3.369	1179.2	18.0183077	0.00345	0.015094154	0.015094154
SMAW	LINCOLN FW5P-3/32 6010	E6010	25.6	350	8.96	3.369	1179.2	18.0183077	0.00345	0.015094154	0.015094154
SMAW	UTP 85 FN Cast Iron	ENI-CI ³	18.2	3	0.0546	3.369	10.1	0.18396	0.00002	0.00009198	0.00009198
GMAW	Murex Murematic S4 Plus	E705 ⁴	5.2	2910	15.132	3.369	9804.461538	50.9832	0.00582	0.0254916	0.0254916
FCAW	Hobart Fabshield 21B	E71T	12.2	30	0.122	3.369	33.69230799	0.41104615	4.7E-05	0.000205523	0.000205523
GMAW	Hobart HB 28 #11	E705	5.2	20	0.104	3.369	67.38461538	0.3504	0.00004	0.0001752	0.0001752
FCAW	Hobart Arc 71	E71T	12.2	10626	129.64	3.369	35801.4	436.7776	0.0499	0.2184	0.2184
FCAW	Lincoln Wire Outershield 71M	E71T	12.2	925	11.29	3.369	3,116.5	38.0218	0.0043	0.0190	0.0190
GTAW ⁷	Alcotec Aluminum TIG Wire	NA		30							
GTAW ⁷	UTP 309L	NA		33							
GTAW ⁷	UTP ER308L	NA		530							
GTAW ⁷	SOW ER705	NA		20							
Brazing ⁸	NA										
Totals:				18,342	235.91		61798.43	794.84	0.09	0.40	0.40

Type of Welding ¹	Welding Rod Name/Model	Type of Electrode from AP-42 Chapter 12.19	HAP Emission Factor from AP-42 Chapter 12.19 (1 lb/1000 lb of Electrode)					
			Cr	Cr (VI)	Co	Mn	Ni	Pb
SMAW	LIN 308L-V3/32X8	E308	0.393		0.01	2.520	0.430	0
SMAW	Lincoln Escalibur 309 SS	E310 ²	1.53	1.88	0	2.200	0.196	0.024
SMAW	LINCOLN 309-V1/8X8	E310 ²	1.53	1.88	0	2.200	0.196	0.024
SMAW	LINCOLN 309/309L-V MR 1/8X12	E310 ²	1.53	1.88	0	2.200	0.196	0.024
SMAW	LINCOLN 309/309L-V3/32X12	E310 ²	1.53	1.88	0	2.200	0.196	0.024
SMAW	LINCOLN EXCAL1/8 7018	E7018	0.006	0	0.001	1.030	0.002	0
SMAW	LINCOLN EXCAL3/32 7018	E7018	0.006	0	0.001	1.030	0.002	0
SMAW	LINCOLN FW5P-1/8 6010	E6010	0.003	0.001	0	0.991	0.004	0
SMAW	LINCOLN FW5P-3/32 6010	E6010	0.003	0.001	0	0.991	0.004	0
SMAW	UTP 85 FN Cast Iron	ENI-CI ³	0	0	0	0.390	8.900	0
GMAW	Murex Murematic S4 Plus	E705 ⁴	0.01	0	0.01	3.180	0.000	0
FCAW	Hobart Fabshield 21B	E71T	0.02	0	0.01	6.62	0.04	0
GMAW	Hobart HB 28 #11	E705	0.01	0	0.01	3.180	0.000	0
FCAW	Hobart Arc 71	E71T	0.02	0	0.01	6.620	0.040	0
FCAW	Lincoln Wire Outershield 71M	E71T	0.02	0	0.01	6.620	0.040	0

Southern Field Welding
Welding Emissions

Pollutant	Welding Rod Name/Model	Maximum Emissions (lb/hr)	Maximum Emissions (ppm)	Total HAP lb/hr	Total HAP tpy	IDAPA Emission Level (lb/hr)	IDAPA Level of Regulatory Concern	Meets IDAPA Emission Level?	Meets IDAPA Level of Regulatory Concern?
Cr	LIN 308L-V3/32X8	1.21E-09	1.08E-05	7.1E-08	6.18E-04	3.3E-02	3.3E-03	Yes	Yes
	Lincoln Excalber 309 SS	3.89E-09	3.43E-05						
	LINCOLN 309-V1/8X8	3.89E-09	3.43E-05						
	LINCOLN 309/309L-V MR 1/8X12	3.89E-09	3.43E-05						
	LINCOLN 309/309L-V3/32X12	3.89E-09	3.43E-05						
	LINCOLN EXCAL1/8 7018	1.93E-09	1.36E-05						
	LINCOLN EXCAL3/32 7018	1.62E-09	1.42E-05						
	LINCOLN FW5P+1/8 6010	5.19E-10	4.55E-06						
	LINCOLN FW5P+3/32 6010	2.02E-10	1.77E-06						
	UTP 85 FN Cast Iron	0.00E+00	0.00E+00						
	Murex Murematic 54 Plus	5.60E-09	4.90E-05						
	Hobart Falsfield 21B	3.85E-11	3.37E-07						
	Hobart HB 28 #11	3.85E-11	3.37E-07						
	Hobart Arc 71	4.09E-08	3.58E-04						
	Lincoln Wire Outershield 71M	3.56E-09	3.12E-05						
Cr (VI)	LIN 308L-V3/32X8	1.10E-08	9.68E-05	2.0E-08	1.75E-04	5.6E-07	5.6E-08	Yes	Yes
	Lincoln Excalber 309 SS	2.89E-09	2.58E-05						
	LINCOLN 309-V1/8X8	2.89E-09	2.58E-05						
	LINCOLN 309/309L-V MR 1/8X12	2.89E-09	2.58E-05						
	LINCOLN 309/309L-V3/32X12	2.89E-09	2.58E-05						
	LINCOLN EXCAL1/8 7018								
	LINCOLN EXCAL3/32 7018								
	LINCOLN FW5P+1/8 6010	1.73E-10	1.52E-06						
	LINCOLN FW5P+3/32 6010	6.73E-11	5.90E-07						
	UTP 85 FN Cast Iron	0.00E+00	0.00E+00						
	Murex Murematic 54 Plus	0.00E+00	0.00E+00						
	Hobart Falsfield 21B	0.00E+00	0.00E+00						
	Hobart HB 28 #11	0.00E+00	0.00E+00						
	Hobart Arc 71	0.00E+00	0.00E+00						
	Lincoln Wire Outershield 71M	0.00E+00	0.00E+00						
Co	LIN 308L-V3/32X8	3.08E-11	2.70E-07	2.8E-08	2.49E-04	3.3E-03	3.3E-04	Yes	Yes
	Lincoln Excalber 309 SS	0.00E+00	0.00E+00						
	LINCOLN 309-V1/8X8	0.00E+00	0.00E+00						
	LINCOLN 309/309L-V MR 1/8X12	0.00E+00	0.00E+00						
	LINCOLN 309/309L-V3/32X12	0.00E+00	0.00E+00						
	LINCOLN EXCAL1/8 7018	2.21E-10	1.94E-06						
	LINCOLN EXCAL3/32 7018	2.69E-10	2.36E-06						
	LINCOLN FW5P+1/8 6010	0.00E+00	0.00E+00						
	LINCOLN FW5P+3/32 6010	0.00E+00	0.00E+00						
	UTP 85 FN Cast Iron	0.00E+00	0.00E+00						
	Murex Murematic 54 Plus	5.60E-09	4.90E-05						
	Hobart Falsfield 21B	1.92E-11	1.68E-07						
	Hobart HB 28 #11	3.85E-11	3.37E-07						
	Hobart Arc 71	2.04E-08	1.79E-04						
	Lincoln Wire Outershield 71M	1.78E-09	1.56E-05						
Mn	LIN 308L-V3/32X8	7.75E-09	6.79E-05	1.7E-05	1.51E-01	3.3E-01	3.3E-02	Yes	Yes
	Lincoln Excalber 309 SS	3.38E-09	2.96E-05						
	LINCOLN 309-V1/8X8	3.38E-09	2.96E-05						
	LINCOLN 309/309L-V MR 1/8X12	3.38E-09	2.96E-05						
	LINCOLN 309/309L-V3/32X12	3.38E-09	2.96E-05						
	LINCOLN EXCAL1/8 7018	2.28E-07	2.00E-03						
	LINCOLN EXCAL3/32 7018	2.77E-07	2.43E-03						
	LINCOLN FW5P+1/8 6010	1.72E-07	1.50E-03						
	LINCOLN FW5P+3/32 6010	6.67E-08	5.84E-04						
	UTP 85 FN Cast Iron	2.23E-10	1.97E-06						
	Murex Murematic 54 Plus	1.78E-06	1.56E-02						
	Hobart Falsfield 21B	1.27E-08	1.12E-04						
	Hobart HB 28 #11	1.22E-08	1.07E-04						
	Hobart Arc 71	1.35E-05	1.18E-01						
	Lincoln Wire Outershield 71M	1.18E-06	1.03E-02						

Southern Field Welding

Welding Emissions

Element	Welding Process	Electrode	Shielding Gas	Welding Speed (in/min)	Welding Current (A)	Welding Voltage (V)	Welding Time (min)	Welding Distance (ft)	Welding Position	Welding Orientation
Ni	LIN 308L-V3/32X8			1.32E-09			1.16E-05			
	Lincoln Excalber 309 S5			3.02E-10			2.64E-06			
	LINCOLN 309-V1/8X8			3.02E-10			2.64E-06			
	LINCOLN 309/309L-V MR 1/8X12			3.02E-10			2.64E-06			
	LINCOLN 309/309L-V3/32X12			3.02E-10			2.64E-06			
	LINCOLN EXCAL1/8 7018			4.42E-10			3.87E-06			
	LINCOLN EXCAL3/32 7018			6.92E-10			6.06E-06			
	LINCOLN FW5P+1/8 6010			2.69E-10			2.36E-06			
	LINCOLN FW5P+3/32 6010			5.13E-09			4.50E-05			
	UTP 85 FN Cast Iron			0.00E+00			0.00E+00			
	Murex Murematic 54 Plus			0.00E+00			0.00E+00			
	Hobart Fabshield 21B			7.69E-11			6.74E-07			
	Hobart HB 28 #11			0.00E+00			0.00E+00			
	Hobart Arc 71			8.17E-08			7.16E-04			
	Lincoln Wire Outershield 71M			7.12E-09			6.23E-05			
Pb ⁴	LIN 308L-V3/32X8			0.00E+00			0.00E+00			
	Lincoln Excalber 309 S5			3.69E-11			3.23E-07			
	LINCOLN 309-V1/8X8			3.69E-11			3.23E-07			
	LINCOLN 309/309L-V MR 1/8X12			3.69E-11			3.23E-07			
	LINCOLN 309/309L-V3/32X12			3.69E-11			3.23E-07			
	LINCOLN EXCAL1/8 7018			0.00E+00			0.00E+00			
	LINCOLN EXCAL3/32 7018			0.00E+00			0.00E+00			
	LINCOLN FW5P+1/8 6010			0.00E+00			0.00E+00			
	LINCOLN FW5P+3/32 6010			0.00E+00			0.00E+00			
	UTP 85 FN Cast Iron			0.00E+00			0.00E+00			
	Murex Murematic 54 Plus			0.00E+00			0.00E+00			
	Hobart Fabshield 21B			0.00E+00			0.00E+00			
	Hobart HB 28 #11			0.00E+00			0.00E+00			
	Hobart Arc 71			0.00E+00			0.00E+00			
	Lincoln Wire Outershield 71M			0.00E+00			0.00E+00			

Notes:

- 1 SMAW: Shielded metal arc welding; FCAW = Flux cored arc welding, GMAW = Gas Metal Arc Welding, GTAW = Gas Tungsten Arc
- 2 E309 is not listed in table 12.19-1 of AP-14 Chapter 12.19. The emission factor from E310 was used as a surrogate.
- 3 Assume PM10 = PM2.5
- 4 Pb HAP emission factor is for Tetramethyl lead, as Pb from IDAPA Section 585.
- 5 UTP 85 FN Cast Iron is a Nickel - Iron Electrode. ENI-CI electrode type was used as a surrogate from AP-42 because it was the highest of the Nickel type of electrode listed.
- 6 MSDS indicates that the electrode type is ER70S-4. Used E70S emission factor from AP-42 as surrogate.
- 7 Emissions from GTAW and Brazeing are generally considered to be insignificant. No emission factors for these types of welding are included in Chapter 12.19 of AP-42 or in EPA's WebFIRE database. For these reasons, emissions from these types of welding are not included in the EI.

Southern Field Welding
Emissions Estimates from Paint Booth

2600
8760
3.365

Actual Hours of Operation:
Potential Hours of Operation:
Calculated Scaling Factor:

Paint Gun:	Groco ULTRA MAMI 695
Transfer Control Efficiency:	75%
Pre-Filtering Pre-Filter:	EM1 Filtration Blue/White Poly Roll PL-1000 Task
Pre-Filtering Efficiency:	91.2%
Booth Particulate Primary Filter:	Filter: F-560 GK
Primary Filter Control Efficiency:	99.9%
Effective Control Efficiency (Pre and Primary Filter):	99.91%

Manufacturer	Part Code	Coating Usage (gal/year)	lb VOC/gal of Coating	Density (lb/gal)	Point Spray Gun Transfer Efficiency (%)	Booth Particulate Filters Effective Control Efficiency (%)			Maximum Annual PM10 Emissions (lb PM10/yr)	
						Actual Annual PM10 Emissions (lb PM10/yr)	Actual Hourly PM10 Emissions (lb PM10/hr)	Maximum Annual PM10 Emissions (lb PM10/yr)		
Valley Paint Manufacturing	083 Gray Primer	33	3.88	10.1988	75%	99.91%	0.1	0.000	0.2	0.000
Valley Paint Manufacturing	009 White Primer	17	4.17	10.1975	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2104 Km Gloss White Silicone	90	3.69	9.20775	75%	99.91%	0.2	0.000	0.6	0.000
Valley Paint Manufacturing	097 Enamel Reducer Medium	384	6.92	10.468	75%	99.91%	0.3	0.000	0.9	0.000
Valley Paint Manufacturing	2101 Km White Primer	10	3.83	10.468	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2133 White Intermediate Coat	30	4.3	10.51527	75%	99.91%	0.1	0.000	0.3	0.000
Valley Paint Manufacturing	2513 Km Black SJ Alkyd	373	3.78	7.68899	75%	99.91%	0.1	0.000	0.2	0.000
Valley Paint Manufacturing	2516 Black Phenolic Primer	243	4.18	8.93331	75%	99.91%	0.2	0.000	0.7	0.001
Valley Paint Manufacturing	2001 Urethane Activator	165	3.52	8.48334	75%	99.91%	0.3	0.000	1.1	0.001
Valley Paint Manufacturing	2126 Gloss White Silicone Enamel	80	3.29	10.0372	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2105 White Silicone Enamel	30	4.57	9.41973	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2106 Silicone Mod Clear Enamel	20	3.75	7.63855	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2130 White Super Speed Enamel	20	3.75	8.48334	75%	99.91%	0.0	0.000	0.0	0.000
Valley Paint Manufacturing	2106 White Super Speed Enamel	20	4.57	10.77	75%	99.91%	0.0	0.000	0.0	0.000
Carboline	PHENOLINE S309744905D - PART A	375	0.11	8.10	75%	99.91%	0.1	0.000	0.3	0.001
Carboline	PHENOLINE S309744905D - PART B	75	0.08	8.10	75%	99.91%	0.1	0.000	0.3	0.001
Hesby	Phosphatizer #2	165	0.45	9.01	75%	99.91%	0.3	0.000	1.1	0.000
Total Coatings Usage:		1890								
Maximum Coatings Usage (Using Scaling Factor):		687.25								

Totals (lb):	Actual Annual PM10 Emissions (lb PM10/yr)	3.8	Actual Hourly PM10 Emissions (lb PM10/hr)	0.0014	Maximum Annual PM10 Emissions (lb PM10/yr)	12.7
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Maximum Annual PM10 Emissions (lb)	1.006
Maximum Annual PM2.5 Emissions (lb)	0.106

Emissions of VOC from AP-42 Chapter 4.2.2.1 General Industrial Surface Coating

Manufacturer	Part Code	Coating Usage (gal/year)	lb VOC/gal of Coating	Density (lb/gal)	Percent VOC Content (%)	Actual Annual VOC Emissions (lb VOC/yr)			Maximum Annual VOC Emissions (lb VOC/yr)
						Actual Annual VOC Emissions (lb VOC/yr)	Actual Hourly VOC Emissions (lb VOC/hr)	Maximum Annual VOC Emissions (lb VOC/yr)	
Valley Paint Manufacturing	083 Gray Primer	33	3.88	10.1988	70.9	2.33	0.09	43.40	0.09
Valley Paint Manufacturing	009 White Primer	17	4.17	10.1975	70.9	0.71	0.03	1.18	0.03
Valley Paint Manufacturing	2104 Km Gloss White Silicone	90	3.69	9.20775	70.9	3.21	0.12	1.18	0.12
Valley Paint Manufacturing	097 Enamel Reducer Medium	384	6.92	10.468	70.9	13.42	0.51	4.52	0.51
Valley Paint Manufacturing	2101 Km White Primer	10	3.83	10.468	70.9	0.38	0.01	1.29	0.01
Valley Paint Manufacturing	2133 White Intermediate Coat	30	4.3	10.51527	70.9	1.29	0.05	4.34	0.05
Valley Paint Manufacturing	2513 Km Black SJ Alkyd	373	3.78	7.68899	70.9	1.69	0.06	4.79	0.06
Valley Paint Manufacturing	2516 Black Phenolic Primer	243	4.18	8.48334	70.9	1.01	0.04	3.47	0.04
Valley Paint Manufacturing	2001 Urethane Activator	165	3.52	8.48334	70.9	0.58	0.02	1.95	0.02
Valley Paint Manufacturing	2126 Gloss White Silicone Enamel	80	3.29	10.0372	70.9	0.27	0.01	0.86	0.01
Valley Paint Manufacturing	2105 White Silicone Enamel	30	4.57	9.41973	70.9	0.21	0.01	0.70	0.01
Valley Paint Manufacturing	2106 Silicone Mod Clear Enamel	20	3.75	7.63855	70.9	0.14	0.00	0.46	0.00
Valley Paint Manufacturing	2130 White Super Speed Enamel	20	3.75	8.48334	70.9	0.14	0.00	0.46	0.00
Carboline	PHENOLINE S309744905D - PART A	375	0.11	8.10	100%	41.2	1.53	135.44	1.53
Carboline	PHENOLINE S309744905D - PART B	75	0.08	8.10	100%	40.2	1.49	135.44	1.49
Hesby	Phosphatizer #2	165	0.45	9.01	100%	28.9	1.09	95.31	1.09
Total Coatings Usage:		2633							
Maximum Coatings Usage (Using Scaling Factor):		897.2							

Totals (lb):	Actual Annual VOC Emissions (lb VOC/yr)	11823.4	Actual Hourly VOC Emissions (lb VOC/hr)	4.5	Maximum Annual VOC Emissions (lb VOC/yr)	4.5
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Note:

- 1 Carboline PHENOLINE 309A has a specific gravity of 1.29 and Phenoxide B has a specific gravity of 0.97. Both MSDS sheets state that the volatile components is less than 1%.
- 2 Assume PM10 = PM2.5.
- 3 Hesby Phosphatizer #2 has a specific gravity of 1.08. Ethylene Monoethyl Ether is listed as having a weight % of 1 - 5%.

Southern Field Welding
Paint Booth Space Heater Emissions

8760
0.0015 Ultra Low Sulfur Diesel
99.91% See Paint Booth Emissions Summary.

Hours of Operation:
Sulfur Weight %:
Particulate Control from Paint Booth^a:

Building Heaters
AP-42 Chapter 1.3 Fuel Oil Combustion

Heater #	Heat Rate (btu/hr)	Heat Rate (mmbtu/hr)	Diesel Usage (gal/hr)	NOx (lb/hr)	NOx (lb/hr)	SO ₂ (lb/yr)	CO (lb/yr)	VOC (lb/yr)	Pb (lb/yr)	PM (lb/yr)	PM10 (lb/yr)	PM2.5 (lb/yr)	CO ₂ (lb/yr)	CH ₄ (lb/yr)	N ₂ O (lb/yr)
1	111000	0.1110	0.8500	0.017	0.008	0.008	0.016	0.001	3.85E-09	1.09E-09	3.28E-06	3.28E-06	83.0229	0.0001	0.0011
2	175000	0.1750	1.3000	0.026	0.012	0.012	0.024	0.002	6.07E-09	1.82E-09	5.01E-06	5.01E-06	126.9762	0.0001	0.0016
3	175000	0.1750	1.3000	0.026	0.012	0.012	0.024	0.002	6.07E-09	1.82E-09	5.01E-06	5.01E-06	126.9762	0.0001	0.0016
Total	0.4610	0.4610	3.4500	0.0690	0.0322	0.0322	0.0756	0.0084	1.60E-08	4.39E-08	1.33E-05	1.33E-05	336.9753	0.0003	0.0044

Pollutant	Emission Factors Distillate Fuel Oil
NOx	20 lb/10 ³ gal Table 1.3-1
CO	5 lb/10 ³ gal Table 1.3-1
SO ₂ ^a	0.213 lb/10 ³ gal Table 1.3-1
VOC ^b	0.596 lb/10 ³ gal Table 1.3-3
PM (Total Filterable + Condensable)	3.3 lb/10 ³ gal Table 1.3-1 and Table 1.3-2
PM10	1 lb/10 ³ gal Table 1.3-6
PM2.5	0.25 lb/10 ³ gal Table 1.3-6
CH ₄	22300 lb/10 ³ gal Table 1.3-12
CO ₂	0.216 lb/10 ³ gal Table 1.3-3
CH ₄ GWP	21 40 CFR 98, Table A-1 of Subpart A
N ₂ O	0.26 lb/10 ³ gal Table 1.3-8
CH ₄ GWP	310 40 CFR 98, Table A-1 of Subpart A
Pb	9 lb/tbu Table 1.3-10

tpy 338.34

Notes:

- ^a SO₂ lb/hr calculated using equation 142-%Sulfur in Fuel from Table 1.3-1.
- ^b Total Organic Carbon emission factor from Table 1.3-3 used for VOCs.
- ^c Diesel heaters are located in the paint booth and are used to dry painted equipment. lb/hr columns are hidden to minimize the printable area.

General

Southern Field Welding Paint Booth Heater Emissions for Paint Drying - HAPs and TAPs

Hours of Operation: 6760
 Sulfur Weight %: 0.0015 Ultra Low Sulfur Diesel
 Particulate Control from Paint Booth: 99.91% See Paint Booth Emissions Summary.

Building Heaters AP-42 Chapter 1.3 Fuel Oil Combustion

Heater #	Heat Rate (btu/hr)	Heat Rate (mmbtu/hr)	Heat Rate (Tbtu/hr)	Diesel Usage (gal/hr) ^a	Diesel Usage (10 ³ gal/hr) ^a
1	111,000	0.1110	1.11E-07	0.8500	0.00085
2	175,000	0.1750	1.75E-07	1.3000	0.00130
3	175,000	0.1750	1.75E-07	1.3000	0.00130
Total:	461,000	0.4610	4.61E-07	3.4500	0.0035

Specified Organic Compounds from Diesel Combustion Emission Factors

CAS	Pollutant	Emission Factor	Source	Emissions (lb/hr)	Emissions (tpy)	Listed in Table 686 or 688 of IDAPA		Source Meets Emission Level?
						IDAPA	IDAPA Emission Level (lb/hr)	
71-43-2	Benzene	2.14E-04 lb/10 ³ gal	Table 1.3-9	7.4E-07	3.2E-06	586	8.00E-04	Yes
100-41-4	Ethylbenzene	6.35E-06 lb/10 ³ gal	Table 1.3-9	2.2E-07	9.6E-07	586	29	Yes
50-00-0	Formaldehyde	3.30E-02 lb/10 ³ gal	Table 1.3-9	1.1E-04	5.0E-04	586	5.10E-04	Yes
81-03-3	Naphthalene	1.13E-03 lb/10 ³ gal	Table 1.3-9	3.9E-06	1.7E-05	586	3.33	Yes
71-58-6	1,1,1-Trichloroethane (aka Methyl Chloroform)	2.33E-04 lb/10 ³ gal	Table 1.3-9	8.1E-07	3.6E-06	586	127	Yes
108-88-3	Toluene	6.70E-03 lb/10 ³ gal	Table 1.3-9	2.1E-06	9.4E-06	586	25	Yes
1330-20-7	o-Xylene	1.09E-04 lb/10 ³ gal	Table 1.3-9	3.6E-07	1.6E-06	586	585	Yes
63-32-9	Acenaphthene ^b	2.17E-05 lb/10 ³ gal	Table 1.3-9	7.3E-08	3.2E-07	No	NA	NA
208-96-8	Acenaphthylene	2.53E-07 lb/10 ³ gal	Table 1.3-9	8.7E-10	3.8E-09	No	NA	NA
120-12-7	Anthracene ^b	1.22E-06 lb/10 ³ gal	Table 1.3-9	4.20E-09	1.84354E-08	No	NA	NA
95-85-3	Benz(a)anthracene ^b	4.01E-06 lb/10 ³ gal	Table 1.3-9	1.4E-08	6.1E-08	586	9.10E-05	See POMPAH Summary Below
205-99-2, 205-82-3	Benzo(b)fluoranthene ^b	1.48E-06 lb/10 ³ gal	Table 1.3-9	5.1E-09	2.2E-08	586	9.10E-05	See POMPAH Summary Below
191-04-2	Benzo(k)fluoranthene ^b	2.26E-06 lb/10 ³ gal	Table 1.3-9	7.797E-09	3.41509E-08	No	NA	See POMPAH Summary Below
218-01-9	Chrysene ^b	2.38E-06 lb/10 ³ gal	Table 1.3-9	8.2E-08	3.6E-08	586	9.10E-05	See POMPAH Summary Below
63-70-3	Dibenz(a,h)anthracene ^b	1.67E-06 lb/10 ³ gal	Table 1.3-9	5.6E-09	2.5E-08	586	9.10E-05	See POMPAH Summary Below
206-44-0	Fluoranthene ^b	4.64E-06 lb/10 ³ gal	Table 1.3-9	1.6698E-08	7.31372E-08	No	NA	See POMPAH Summary Below
86-73-7	Fluorene ^b	4.47E-06 lb/10 ³ gal	Table 1.3-9	1.5E-08	6.6E-08	No	NA	NA
193-09-6	Ind(1,2,3-cd)pyrene ^b	2.14E-06 lb/10 ³ gal	Table 1.3-9	7.4E-09	3.2E-08	586	9.10E-05	See POMPAH Summary Below
85-01-8	Phenanthrene ^b	1.05E-06 lb/10 ³ gal	Table 1.3-9	3.6225E-08	1.58666E-07	No	NA	NA
120-00-0	Pyrene ^b	4.26E-06 lb/10 ³ gal	Table 1.3-9	1.46829E-08	6.42218E-08	No	NA	NA
3286-87-9	OCDD ^b	3.10E-06 lb/10 ³ gal	Table 1.3-9	1.0595E-11	4.68441E-11	586	1.50E-10	Yes

PAH or POM in listed in IDAPA 88.01.01.686	lb/hr	Idaho PAH Standard (lb/hr)	Source Meets PAH Standard?
	4.0E-08	9.10E-05	Yes

Metals from Diesel Combustion Emission Factors

CAS	Pollutant	Emission Factor	Source	Emissions (lb/hr) ^c	Emissions (tpy)	Listed in Table 686 or 688 of IDAPA		Source Meets Emission Level?
						IDAPA	IDAPA Emission Level (lb/hr) ^d	
7440-38-2	Arsenic (As)	Particulate ^e	4 lb/Tbtu	1.3E-09	7.1E-09	586	1.50E-06	Yes
440-41-7	Barium (Ba)	Particulate ^e	3 lb/Tbtu	1.2E-09	5.3E-09	586	2.60E-05	Yes
7440-43-9	Cadmium (Cd)	Particulate ^e	3 lb/Tbtu	1.2E-09	5.3E-09	586	3.70E-06	Yes
7440-47-3	Chromium (Cr)	Particulate ^e	3 lb/Tbtu	1.2E-09	5.3E-09	586	0.033	Yes
7440-50-6	Copper (Cu)	Particulate ^e	8 lb/Tbtu	2.4E-09	1.1E-08	586	0.013	Yes
7439-92-1	Lead (Pb) - Accounted for with Criteria Pollutants	Particulate ^e	8 lb/Tbtu	2.4E-09	1.1E-08	NA	NA	NA
7439-87-6	Mercury (Hg)	Gas ^f	3 lb/Tbtu	1.2E-02	5.3E-02	See note d.	25	Yes
7439-96-6	Manganese (Mn)	Particulate ^e	8 lb/Tbtu	2.4E-09	1.1E-08	586	8.70E-02	Yes
7440-02-0	Nickel (Ni)	Particulate ^e	3 lb/Tbtu	1.2E-09	5.3E-09	586	2.70E-05	Yes
7782-48-2	Selenium (Se)	Particulate ^e	16 lb/Tbtu	6.1E-09	2.97E-08	586	1.30E-02	Yes
7440-66-6	Zinc (Zn)	Particulate ^e	4 lb/Tbtu	1.3E-09	7.1E-09	586	6.67E-01	Yes

Notes:

- ^a Fuel use rates as provided by SFW.
- ^b PAH/POM for comparison to emission threshold in IDAPA 88.01.01.686.
- ^c Used Emission level of 2,3,7,8,-TCDD for screening.
- ^d Hg standard in lbs/year for compliance with IDAPA 88.01.01.215 standard of 28 lbs/year.
- ^e Per Table 4-11 of Report on Revisions to 6th Edition AP-42 Section 1.3 Fuel Oil Combustion, page 4-44.
- ^f Based on Copper boiling point of 2635 K.
- ^g Based on Selenium boiling point of 958 K.
- ^h POM per AP-42.

Southern Field Welding
 Shop Heater Emissions - Criteria Pollutants

Hours of Operation (Max): 8760
 Fuel Type: Natural Gas
 Natural Gas Heating Value (btu/scf): 1050

AP-42 Appendix A

Building Heaters
 AP-42 Chapter 1.4 Natural Gas Combustion

Advanced Heaters	Heater Model	Number of Heaters in Shop	Heat Rate Per Heater (btu/hr)	Fuel Usage (10% scfm/hr)	NOX (tpy)	SO2 (tpy)	CO (tpy)	VOC (tpy)	Pb (tpy)	PM (tpy)	PM10 (tpy)	PM2.5 (tpy)	CO2 (tpy)	CH4 (lb/hr)	CH4 (tpy)	N2O (tpy)
Advanced Distributor Products	SEP Series 175-A	2	150000	0.0083	0.14	0.00	0.06	0.01	7.20E-07	0.01	0.01	0.01	172.70	0.001	0.00	0.00
Medline	High Efficiency II PDP 150	3	150000	0.0084	0.16	0.00	0.06	0.01	8.39E-07	0.01	0.01	0.01	225.26	0.001	0.00	0.00
Total				0.0088	0.3117	0.0020	0.1327	0.0182	1.66E-06	0.0252	0.0252	0.0252	397.9543	0.002	0.0076	0.0073

Pollutant	Criteria Pollutant Emission Factors
NOX	84 lb/10 ⁶ scf Table 1.4-1
CO	40 lb/10 ⁶ scf Table 1.4-1
SO2	0.6 lb/10 ⁶ scf Table 1.4-2
VOC	5.5 lb/10 ⁶ scf Table 1.4-2
PM (Total)	7.6 lb/10 ⁶ scf Table 1.4-2
PM10	7.6 lb/10 ⁶ scf Table 1.4-2
PM2.5	7.6 lb/10 ⁶ scf Table 1.4-2
CH4	120000 lb/10 ⁶ scf Table 1.4-2
CH4 GWP	2.3 lb/10 ⁶ scf Table 1.4-2
N2O	2.3 lb/10 ⁶ scf Table 1.4-2
N2O GWP	310 Table 1.4-2
Pb	0.0005 lb/10 ⁶ scf Table 1.4-2

Notes
 General
 lb/hr columns and other informational columns are hidden to minimize the printable area.

Total CO2e: 400.38 tpy
 81.41 lb/hr

Southern Field Welding

Shop Heater Emissions - HAPs and TAPs

7160
Natural Gas
1699

AP-42 Appendix A

Heater of Operation (Fuel):
Natural Gas
Natural Gas Heating Value (Btu/lscf):

Building Heaters
AP-42 Chapter 1.4 Natural Gas Combustion

Advanced Distributor Products	Heater Model	Number of Heaters in Shop	Heat Rate Per Heater (Btu/hr)	Total Heat Rate (mmBtu/hr)	Fuel Usage (scf/hr)	Fuel Usage (10 ⁶ scf/Year)
SEF, Sankin, TISA		2	17500	0.2450	326.57	2.86
High Efficiency II PDF 150		3	15000	0.4500	0.00043	3.75
			Total:	0.7950	757.158	6.63

Speciated Organic Compounds from Natural Gas Combustion Emission Factors

CAS #:	Chemical Name	Natural Gas	Emissions (lb/hr)	Emissions (ppb)	POMPAH?	Used HAP in Section 112(b) of Clean Air Act per AP-42, 1.4	Used per IDAPA 58.01.01.685 (lb/yr)	Meets IDAPA 58.01.01.685 Emission Level?	Used per IDAPA 58.01.01.685 Emission Level?	Meets IDAPA 58.01.01.685 Emission Level?
91-57-6	Bullvalent	2.40E-05 lb/10 ⁶ scf	1.8E-08	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
58-09-5	3-Methylbutadiene ^a	1.80E-05 lb/10 ⁶ scf	1.4E-08	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
83-32-8	7,12-Dimethylbenzofuran ^a	1.80E-05 lb/10 ⁶ scf	1.4E-08	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
120-12-7	Acenaphthene ^b	2.40E-06 lb/10 ⁶ scf	1.8E-09	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
58-55-3	Anthracene ^b	1.80E-06 lb/10 ⁶ scf	1.4E-09	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
71-43-2	Benzo[<i>a</i>]anthracene ^c	2.10E-03 lb/10 ⁶ scf	1.6E-06	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
205-99-2	Benzo[<i>b</i>]fluoranthene ^c	1.20E-05 lb/10 ⁶ scf	9.1E-10	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
179-24-2	Benzo[<i>k</i>]fluoranthene ^b	1.20E-05 lb/10 ⁶ scf	9.1E-10	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
108-97-8	Chrysene ^c	1.20E-05 lb/10 ⁶ scf	9.1E-10	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
53-70-3	Dibenz[<i>a,h</i>]anthracene ^c	1.20E-05 lb/10 ⁶ scf	9.1E-10	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
2527-22-5	Dichlorobenzene	1.20E-03 lb/10 ⁶ scf	1.0E-07	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
74-84-0	Ethane	1.20E-03 lb/10 ⁶ scf	2.3E-03	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
206-44-0	Fluoranthene ^b	3.00E-06 lb/10 ⁶ scf	2.3E-09	6.0E-09 AP-42	Yes	No	NA	NA	NA	NA
103-54-3	Formaldehyde	7.50E-02 lb/10 ⁶ scf	5.7E-05	6.0E-03 No	Yes	Yes	17	5.10E-04	5.10E-04	NA
119-84-6	Hexane, 1,2,3-trimethyl ^c	1.80E-06 lb/10 ⁶ scf	1.4E-09	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
109-96-0	Naphthalene	2.80E-05 lb/10 ⁶ scf	2.2E-08	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
85-07-8	Phenanthrene ^a	1.70E-05 lb/10 ⁶ scf	1.3E-08	6.0E-09 AP-42 and Idaho Rules	Yes	No	NA	NA	NA	NA
74-98-5	Pyrene ^b	5.00E-06 lb/10 ⁶ scf	3.8E-09	6.0E-09 AP-42	Yes	Yes	18	5.10E-05	5.10E-05	NA
108-98-3	Toluene	3.40E-03 lb/10 ⁶ scf	2.6E-06	6.0E-03 No	Yes	Yes	25	1.1E-05	1.1E-05	NA
			Idaho PAH Standard (lb/hr)		Source Meets PAH Standard?					
			PAH or POM in listed in IDAPA 58.01.01.686	8.6E-09	9.10E-05	Yes				

Southern Field Welding
Shop Heater Emissions - HAPs and TAPs

Metals from Natural Combustion Emission Factors

CAS #	Element	Natural Gas	Emissions (lb/hr)	Emissions (lb/year)	Emissions (tpy)	Listed HAP in Section 112(b) of Clean Air Act per AP-42.1.4	Exceeds per IDAPA 58.01.01.506	IDAPA 58.01.01.506 Emission Level (lb/hr)	Exceeds IDAPA 58.01.01.506 Emission Level?
7440-38-2	Barium	2.0E-04 lb/10 ⁶ scf	1.5E-07	1.3E-03	6.6E-07	Yes	No	1.50E-05	Yes
7440-38-3	Beryllium	3.9E-05 lb/10 ⁶ scf	3.9E-06	2.9E-02	1.5E-05	No	Yes	2.6E-05	Yes
7440-41-7	Cadmium	1.0E-05 lb/10 ⁶ scf	8.1E-07	9.0E-03	4.0E-06	Yes	Yes	3.70E-06	Yes
7440-43-9	Chromium	1.0E-03 lb/10 ⁶ scf	8.1E-07	0.0E+00	0.0E+00	Yes	Yes	-	NA
7440-47-3	Cobalt	8.4E-05 lb/10 ⁶ scf	6.4E-09	5.6E-04	2.8E-07	Yes	Yes	-	NA
7440-50-8	Copper	8.9E-04 lb/10 ⁶ scf	6.4E-07	5.6E-03	2.8E-06	No	No	-	NA
7439-98-5	Mercury	3.9E-04 lb/10 ⁶ scf	2.9E-07	2.5E-03	1.3E-06	Yes	Yes	-	NA
7439-98-7	Manganese	4.0E-04 lb/10 ⁶ scf	2.9E-07	1.7E-03	8.6E-07	Yes	Yes	25	Yes
7440-09-0	Molybdenum	1.0E-03 lb/10 ⁶ scf	1.9E-06	1.4E-03	3.6E-06	No	Yes	-	NA
7782-48-2	Nickel	2.0E-05 lb/10 ⁶ scf	1.9E-06	1.6E-04	6.0E-06	Yes	Yes	2.7E-05	Yes
7440-66-2	Selenium	2.3E-03 lb/10 ⁶ scf	1.7E-06	1.5E-02	7.0E-06	No	No	-	NA
7440-68-9	Zinc	2.9E-02 lb/10 ⁶ scf	2.2E-05	1.9E-01	9.0E-05	No	Yes	-	NA

Notes

- ^a Hg standard in lb/year for compliance with IDAPA 58.01.01.215 standard of 25 lb/year.
- ^b POM per AP-42.
- ^c PAN/POM for comparison to emission threshold in IDAPA 58.01.01.506.

Southern Field Welding Abrasive Blasting Emissions

Maximum Annual Operating Hours for PTE:

8760

6,044,400

Blasting Material Used	Max Annual Usage (lbs) ^c	PM and PM10 Control Efficiency ^b	PM2.5 Control Efficiency ^d	Total PM (lb/hr)	Total PM (tpy)	Total PM10 (lb/hr)	Total PM10 (tpy)	Total PM2.5 (lb/hr)	Total PM2.5 (tpy)
SHARSHOT 30X60 - BLACK SLAG	614,884.62	91.2%	35.8%	0.56	2.46	0.08	0.35	0.06	0.26

Emission Factors	
Sand Blasting of Mild Steel Panels	
Total PM ^a	91 lb/10 ³ lb abrasive Table 13.2.6-1
PM10	13 lb/10 ³ lb abrasive Table 13.2.6-1
PM2.5	1.3 lb/10 ³ lb abrasive Table 13.2.6-1

Notes:

^a Used most conservative emission factor of 91 lbs/10³ lbs abrasive from Table 13.2.6-1

^b Abrasive blasting is fully enclosed - solid wood walls, with full blast enclosures; Exhaust Fan - 91.2% efficiency filtered, 48" suction port, Reclamation system with deflection wall.

^c See "Abrasive Blasting Detail" sheet.

^d See "PM2.5 Interpolation Sheet."

Southern Field Welding

Abrasive Blasting Emissions

Date

Memo

Parts

BLASTING MATERIAL-

SS30/60 BB

05/18/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
06/07/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
07/15/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
08/15/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
08/22/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
08/29/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
09/08/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
09/08/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
10/05/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)
10/09/2011 SHARPSHOT 30X60 - BLACK SLAG (2 TON BAG)

Actual Hours of Operation: 2600
Potential Hours of Operation: 8760
Calculated Scaling Factor: 3.369

Source Name	Qty
Alta Paints & Coatings	4,000
Alta Paints & Coatings	12,000
Alta Paints & Coatings	12,000
Alta Paints & Coatings	-
Alta Paints & Coatings	8,000
Alta Paints & Coatings	8,000
Alta Paints & Coatings	16,000
Total SS30/60 BB	72,000
Total BLASTING MATERIAL-	72,000
	72,000
	72000 lbs

First Order Date:	05/18/2011
Last Order Date:	10/09/2011
Total Days Between Orders:	144
Total Lbs of Material Used Over this Period:	72,000
Calculated Actual Use (lbs/day):	500
Calculated Maximum Use Using Scaling Factor (lbs/day):	1684.6
Annual Maximum Usage Using Scaling Factor (365 days/year):	614,885

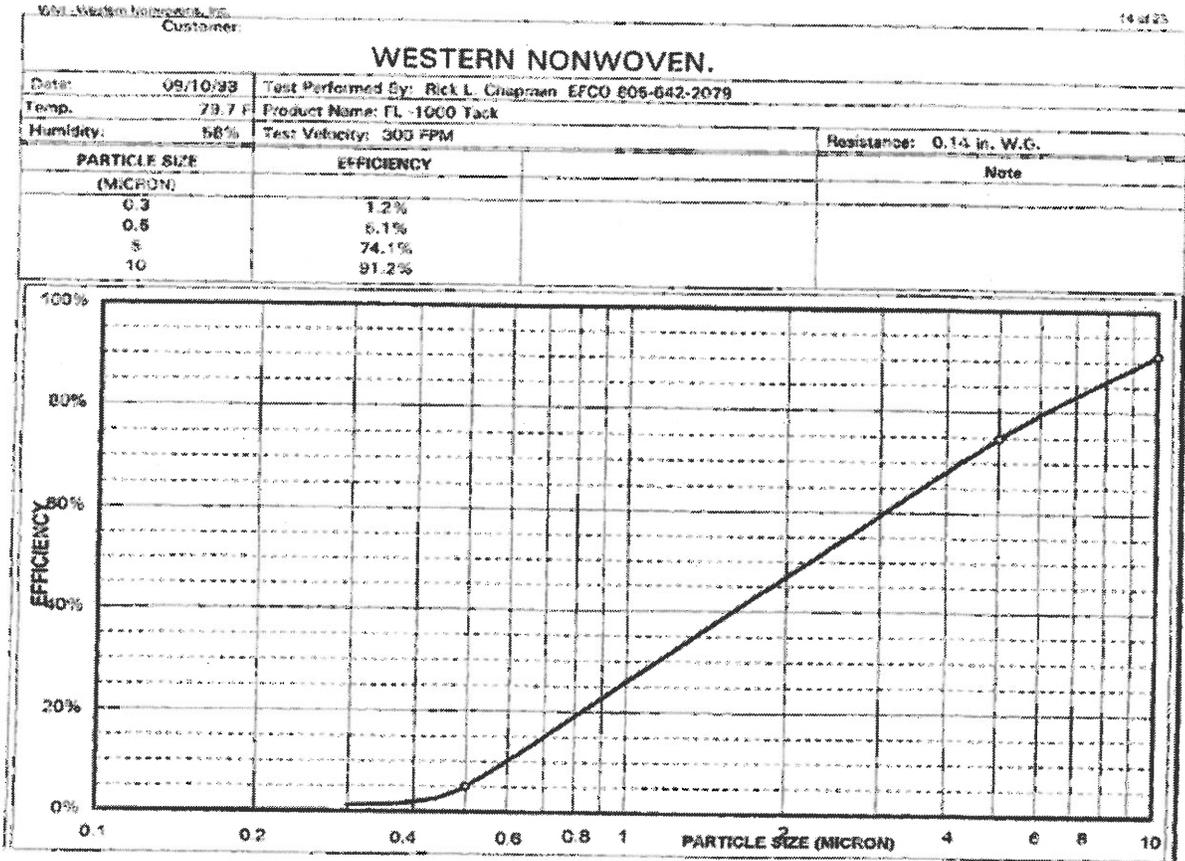
Southern Field Welding

PM2.5 Control Efficiency Interpolation for Pre-Filter

Particle Size

Control Efficiency

5	74.1%
2.5	36% Interpolated using given control efficiencies.
0.5	5.1%



APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on June 8, 2012:

Facility Comment: Comment #1: SFW does not perform grinding or polishing with machines as defined in 40 CFR Part 63 Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

A typo occurs on page 16 of the Statement of Basis stating that SFW is an affected source regarding grinding and dry polishing:

"SFW doesn't perform grinding or polishing with machines that using MFHAP containing material. Therefore, SFW is an affected source regarding grinding and dry polishing."

SFW conducts hand grinding, hand polishing, and bench top dry grinding and dry polishing. These activities are not included in the affected source category under this subpart. This statement on page 16 of the Statement of Basis should be corrected to state that SFW is not an affected source regarding grinding and dry polishing. Page 19 of the Statement of Basis correctly states that the standards for dry grinding and dry polishing for machines are not applicable to the facility.

DEQ Response: This has been corrected.

Facility Comment: Comment #2: The Statement of Basis states that SFW must meet all of the requirements of 40 CFR Part 63 Subpart XXXXXX §11516(f)(1) and(2).

This statement infers that SFW must meet all of the requirements of 11516(f)(2)(i) through (v). The rule states that a facility 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. SFW will comply with the subpart by implementing one or more of these management practices, but SFW is not required to implement all of the identified management practices. Permit condition 3.3.3 correctly states that SFW is required to implement one or more of the identified management practices.

DEQ Response: The SOB has been reworded as follows: The applicable requirements from 40 CFR 63.11516(f) and 40 CFR 63.11516(f)(2) are addressed in Permit Conditions 3.3.1 and 3.3.3.

Facility Comment: Comment #3: The permit application included incorrect SIC and NAICS codes for the SFW facility.

The submitted permit application included required General Information Form GI which includes an identified SIC and NAICS code for the facility. The submitted form stated that SIC Code 3441 and NAICS Code 332312 characterize the operations of the facility. These codes are for Fabricated Structural Metal Manufacturing. Although SFW has manufactured some structural metal, these types of projects do not represent most of the products manufactured at the facility. SFW primarily manufactures food processing equipment and equipment for oil and gas facilities. Therefore, the SIC Code 3499 *Fabricated Metal Products* and the NAICS Code 332999 *All Other Miscellaneous Fabricated Metal Product Manufacturing* are more accurate codes for the facility. Attached to this comment letter is an updated Form GI which includes the appropriate codes and includes SIC Code 3533 *Oil and Gas Field Machinery Equipment Manufacturing* as a secondary SIC code. Although these SIC and NAICS codes do not appear in the Statement of Basis or the Draft Permit, Bison and SFW wish to correct these codes to ensure that the Idaho Department of Environmental Quality has the most accurate information on file. Bison and SFW apologize for not submitting the appropriate SIC and NAICS codes in the original permit application submittal package.

DEQ Response: The correction is now on file.

Facility Comment: Comment #4: The Statement of Basis includes a few typographical errors. Bison and SFW noticed the following typographical errors in the Draft Statement of Basis:

- Page 5: "Painting preparation is accomplished using' paint strippers and' the use of.an abrasive blaster"
 - Remove apostrophes on "using" and "and."
 - Remove period after "of"

- Page 5: "... capacity"
 - Remove apostrophe after "capacity."
- Page 19: "SFW does not perform dry grinding and polishing with m achiness using materials containing MFHAP. Thus, this section is not applicable."
 - Remove second s and the extra space in "machines."

DEQ Response: These typos have been fixed.

Facility Comment: Comment #5: The Statement of Basis includes a few references to incorrect permit conditions. Bison and SFW noticed the following references to permit conditions which are incorrect:

- Page 14: "Section 776.01 states that no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution. These requirements are assured by Permit Conditions 2.5 and 2.11."
 - Permit Conditions 2.4 and 2.10 address these requirements.
- Page 14: "The sources of PM10 emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.4."
 - Permit Condition 2.3 addresses this requirement.

DEQ Response: The references have been corrected.

APPENDIX C – PROCESSING FEE