



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
Curt Fransen, Director

June 4, 2015

Neil Justesen, Owner
Southern Field Welding
285 West 35 South
Burley, ID 83318

RE: Facility ID No. 031-00050, Southern Field Welding, Burley
Permit Clarification Notification

Dear Mr. Justesen:

Enclosed is revised Permit to Construct No. P-2012.0021, Project 61527, which replaces your previously issued permit on July 13, 2012. The permit was revised to clarify permit conditions 2.6 and 2.12 to specify the welding rod used in different welding processes. Please replace the permit that DEQ previously mailed you with this revised permit. The accompanying Statement of Basis document remains unchanged.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/drp

Enclosure

Permit No. P-2012.0021 Project 61527

Air Quality

PERMIT TO CONSTRUCT

Permittee Southern Field Welding

Permit Number P-2012.0021

Project ID 61527

Facility ID 031-00050

Facility Location 238 West 35 South
Burley, Idaho, 83318

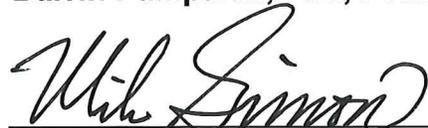
Permit Authority

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

Date Issued June 4, 2015



Darrin Pampaian, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1. PERMIT SCOPE

Purpose

- 1.1 The purpose of this Permit to Construct is to establish enforceable requirements for the facility's operations involving coating, abrasive blasting, welding and shop heaters in accordance with the Rules for the Control of Air Pollution in Idaho. In addition, the permit was revised on June 4, 2015 to clarify permit conditions 2.6 and 2.12.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces permit P-2012.0021, issued July 13, 2012, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 REGULATED SOURCES

Permit Section	Source	Control Equipment
2	<u>Coating Operations</u> Manufacturer: Graco Model: Ultra MaxII 695 75% or greater transfer efficiency	<u>Filtration System</u> EMI Filtration – Blue/White Poly Roll FL-1000 91.2% PM Control Efficiency 48 in ² (One filter per stack) Filtrair – FF-560 GX 99% 36 in ² (One filter per stack)
2	<u>Welding Operations</u> Various welding rods	None
2	<u>Abrasive Blasting</u> Manufacturer: Marco Model: M-2502.5 Maximum Capacity: 1,685 lb/day	<u>Filtration System</u> EMI Filtration – Blue/White Poly Roll FL-1000 91.2% PM Control Efficiency
2	<u>Paint Booth Space Heaters</u> Manufacturer: Mr. Heater, VAL6 Model: 175KTR, KBE5S Maximum Capacity: 0.461 MMBtu/hr combined	None
2	<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

2. COATING, WELDING, ABRASIVE BLASTING AND SPACE HEATERS

2.1 Process Description

Southern Field Welding (SFW) uses a variety of steel base materials to manufacture the food processing and oil field equipment. SFW cuts and welds base materials inside the Fabrication 2 building. SFW uses four specific type of welding rods: Shielded Metal Arc Welding (SMAW), Gas Metal Arc Welding (GMAW), Flux Cored Arc Welding (FCAW) and Gas Tungsten Arc Welding (TIG).

SFW uses a variety of paints, coatings, and thinners. All painting operations are conducted within an included booth with a particulate filtration system. There are also three portable diesel heaters used for heating and drying the painted equipment.

Abrasive blasting is used to prepare metals for welding and painting. SFW uses a material called Sharpshot® manufactured by Minerals Research and Recovery, Inc. as its blasting media.

Lastly, five natural-gas fired space heaters are located throughout the facility for heating purposes.

2.2 Control Device Descriptions

Table 2.1 COATING, WELDING, ABRASIVE BLASTING AND SPACE HEATERS DESCRIPTION

Emissions Units / Processes	Control Devices	Emission Points
<u>Steel Welding:</u> Wire Consumption: 30.9 T/yr	None – Fugitive Emissions vent from Fabrication Bldg #2.	Two vents from Fabrication Bldg #2
<u>Abrasive Blasting:</u> Manufacturer: Marco Model: M-2502.5 Manufacture Date: 2011 Blast media: 100% copper slag Maximum Capacity: 1,685 lb/day	<u>Filtration System:</u> Manufacturer: EMI Model: Blue/White Poly Roll FL-1000 Tack Manufacture Date: 2011 PM ₁₀ Control Efficiency: 91.2%	Blasting stack from Fabrication #2
<u>Paint Booth:</u> Manufacturer: Not given Model: Not Given Construction Date: October 1, 2011 Typical Operations: 10 hr/day; 5 day/wk <u>Paint Spray Gun:</u> Manufacturer: Graco Model: Ultra Max II 695 Max spray rate: 0.95 gal/hr Transfer Efficiency: 75% minimum <u>Booth Heaters (3)</u> Rating: 0.461 MMBtu/hr (aggregated) Fuel Type: Diesel only	<u>Filtration System (Pre-Filter):</u> Manufacturer: EMI Model: Blue/White Poly Roll FL-1000 Tack Manufacture Date: 2011 PM ₁₀ Control Efficiency: 91.2% <u>Filtration System (Primary Filter):</u> Manufacturer: Filtrair Model: FF-560 GX Manufacture Date: 2011 PM ₁₀ Control Efficiency: 99% Combined Control Efficiency: 99.91%	Paint stack from Fabrication #2
<u>Space Heaters (5)</u> Rating: 0.795 MMBtu/hr (aggregated) Fuel Type: Natural Gas only	None	Vented from various buildings (Fabrication #1, #2)

Emission Limits

2.3 Opacity Limit

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

2.4 Odors

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 in accordance with IDAPA 58.01.01.776.01.

Operating Requirements

2.5 Permitted Fuel

The three (3) heaters associated with the paint booth shall only combust distillate fuel which includes either #1 fuel oil, #2 fuel oil or a mixture thereof. The sulfur content of the distillate fuel shall in accordance with IDAPA 58.01.01.725. All other five (5) space heaters shall only combust natural gas as fuel.

2.6 Welding Wire Use Limits

The welding wire used in the welding process shall not exceed the following limits in any consecutive 12-calendar months:

- 10.1 lb/yr of ENi-CI welding wire or equivalent in the Shielded Metal Arc Welding (SMAW)/Manual Metal Arc Welding (MMAW) process, not applicable to the Gas Tungsten Arc Welding (GTAW)/Tungsten Inert Gas Welding (TIG) process, Flux Core Arc Welding (FCAW) process, or the Gas Metal Arc Welding (GMAW)/Metal Inert Gas Welding (MIG) process,
- 53.9 lb/yr of E308 welding wire or equivalent in the SMAW/MMAW process, not applicable to the GTAW/TIG process, FCAW process, or the GMAW/MIG process,
- 108 lb/yr of E310 welding wire or equivalent in the SMAW/MMAW process, not applicable to the GTAW/TIG process, FCAW process, or the GMAW/MIG process,
- 4,212 lb/yr of E6010 welding wire or equivalent in the SMAW/MMAW process, not applicable to the GTAW/TIG process, FCAW process, or the GMAW/MIG process,
- 8,592 lb/yr of E7018 welding wire or equivalent in the SMAW/MMAW process, not applicable to the GTAW/TIG process, FCAW process, or the GMAW/MIG process,
- 9,872 lb/yr of E70S welding wire or equivalent in the GMAW/MIG process, not applicable to the GTAW/TIG process, SMAW/MMAW process, or FCAW process,
- 38,952 lb/yr of E71T welding wire or equivalent in the FCAW process, not applicable to the GTAW/TIG process, the SMAW/MMAW process, or the GMAW/MIG process.

For the purposes of this permit condition, “or equivalent” is defined as a metals, HAP, and TAP content for the new welding wire, as listed on the MSDS, which is equal to or less than the metals, HAP, and TAP content, as listed on the MSDS, of the welding wire as listed in this permit.

[6/4/2015]

2.7 Abrasive Blasting Use Limit

The abrasive blasting media used during the blasting process shall not exceed 614,884 lb/yr in any consecutive 12-calendar months.

2.8 Enamel, Thinner, Primer and Coating Use Limit

The enamel, thinner, primer, and coating use in the metal parts and products coating process shall not exceed a combined amount of 25.6 gallons/day nor the individual gallons/year limit when using the products listed:

- 111 gal/yr Valley Paint Manufacturing Gray Primer or equivalent,
- 57 gal/yr Valley Paint Manufacturing White Primer or equivalent,
- 303 gal/yr Valley Paint Manufacturing Gloss White Silicone or equivalent,
- 654 gal/yr Valley Paint Manufacturing Enamel Reducer Medium or equivalent,
- 34 gal/yr Valley Paint Manufacturing Km White Primer or equivalent,
- 101 gal/yr Valley Paint Manufacturing White Intermediate Coat or equivalent,
- 1,257 gal/yr Valley Paint Manufacturing Km Black Sil Alkyd or equivalent,

- 819 gal/yr Valley Paint Manufacturing Black Phenolic Primer or equivalent,
- 555 gal/yr Valley Paint Manufacturing Urethane Activator or equivalent,
- 270 gal/yr Valley Paint Manufacturing Gloss White Silicone Enamel or equivalent,
- 67 gal/yr Valley Paint Manufacturing White Super Speed Enamel or equivalent,
- 67 gal/yr Valley Paint Manufacturing Silicone Mod Clear Enamel or equivalent,
- 253 gal/yr Carboline Phenoline S309F744905D – Part A or equivalent,
- 556 gal/yr Carboline Phenoline S309F744905D – Part B or equivalent,
- 2,823 gal/yr Univar USA Inc. Lacquer Thinner B or equivalent,
- 20 gal/yr Crown MEK Methyl Ethyl Ketone or equivalent,
- 131 gal/yr Crown Xylol Xylene or equivalent;

For the purposes of this permit condition, “or equivalent” is defined as the HAP, TAP, and VOC content for the new coating, as listed on the MSDS, which is equal to or less than the HAP, TAP, and VOC content, as listed on the MSDS, of the coating as listed in this permit.

2.9 Paint Booth Exhaust Filter System

All priming, painting, or coating at this facility shall be conducted in the paint booth. The permittee shall not conduct priming, painting, or coating in the paint booth unless the paint booth exhaust filter system is installed and operating.

The permittee shall monitor and record visible emissions from the spray booth filter system once per day when operating (for any day that a coating operation is performed in the paint spray booth) to ensure proper control efficiency of 99.91%. The inspection shall consist of a see/no see evaluation for the paint spray booth exhaust system. If any visible emissions are present from the paint spray booth exhaust system, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and opacity test and a description of the following: the permittee’s assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Monitoring and Recordkeeping Requirements

2.10 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors permit condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee’s assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.11 Material Purchase Records and Material Data Safety Sheets

For each material used in the welding, abrasive blasting, metal parts and products coating, including but not limited to welding wire, sharpshot, enamel, thinner, primer, and coating, the permittee shall record and maintain the following records:

- Material purchase records
- Material Safety Data Sheets (MSDS)

2.12 Welding Wire Usage Records

To demonstrate compliance with the Welding Wire Usage permit condition, the permittee shall monitor and record monthly, in pounds, the usage of all welding wire used in the welding process and differentiate between the welding rod used in the SMAW/MMAW, GMAW/MIG, FCAW, and GTAW/TIG processes. The monthly usage records shall be aggregated over a consecutive 12-month period to demonstrate compliance with the annual limits.

[6/4/2015]

2.13 Abrasive Blasting Usage Records

To demonstrate compliance with the Abrasive Blasting Usage permit condition, the permittee shall monitor and record monthly, in pounds, the usage of all blasting media used in the blasting process. The monthly usage records shall be aggregated over a consecutive 12-month period to demonstrate compliance with the annual limits.

2.14 Metal Parts and Products Coating Daily Operation Records

To demonstrate compliance with the Enamel, Thinner, Primer and Coating Usage permit condition, the permittee shall monitor and record daily and monthly, in gallons, the usage of all enamel, thinner, primer, and coating used in the metal parts and products coating process. The monthly usage records shall be aggregated over a consecutive 12-month period to demonstrate compliance with the annual limits of the Enamel, Thinner, Primer and Coating Usage Permit Condition.

2.15 Incorporation of Federal Requirements by Reference

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

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

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

3. 40 CFR 63, SUBPART XXXXXX REQUIREMENTS

3.1 Emission Management Requirements

As specified in 40 CFR 63.11515, the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX for abrasive blasting operations.

- 3.1.1 In accordance with 40 CFR 63.11516(a)(2), for dry abrasive blasting performed in a vented enclosure, as defined in §63.11522, the permittee must filter emissions and vent them to a filtration control device. The device must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices. The management practices must be implemented to minimize emissions of MFHAP by taking measures necessary to minimize excess dust in the surrounding area as practicable, enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials, and operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
- 3.1.2 In accordance with 40 CFR 11616(a)(3)(i), for dry abrasive blasting objects greater than 8 feet in any one dimension, the permittee may implement management practices to minimize emissions of MFHAP. These include taking measures, as practicable, necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions; enclosing abrasive material storage areas and holding bins, sealing chutes and conveyors that transport abrasive material; operating all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; not re-using dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) which have been removed by filtration or screening, and the abrasive material conforms to its original size; and whenever practicable, the permittee must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide).
- 3.1.3 In accordance with 40 CFR 11616(a)(3)(ii)(A), for abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the permittee must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.
- 3.1.4 In accordance with 40 CFR 11616(a)(3)(ii)(B), for abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the permittee must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
- 3.1.5 In accordance with 40 CFR 11616(a)(3)(iii-iv), the permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2). If visible fugitive emissions are detected, the permittee must perform corrective actions until the visible fugitive emissions are eliminated. The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a). The permittee must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the Subpart XXXXXX annual certification and compliance report as required by §63.11519(b)(5).

3.2 Machining Emission Management Requirements

In accordance with, 40 CFR 11616(b), the permittee must implement management practices to minimize MFHAP emissions by taking measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable and must operate all equipment associated with machining according to manufacturer's instructions.

3.3 Welding Emission Management Requirements

- 3.3.1 The permittee must demonstrate that management practices or fume control measures are being implemented by complying with the following requirements. These requirements 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, in accordance with §63.11516(f).
- 3.3.2 The Permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The Permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4).
- 3.3.3 The Permittee must implement one or more of the management practices to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment, in accordance with §63.11516(f)(2).
- Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
 - Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- 3.3.4 *Tier 1 compliance requirements for welding.* The permittee must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2).
- 3.3.5 *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required of this section, the permittee must comply with additional requirements as follows.
- Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the required annual certification and compliance report as required by §63.11519(b)(5).
- 3.3.6 *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), the permittee must comply with the following requirements.
- Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee must conduct a visual determination of emissions opacity, as specified in §63.11517(c), at the primary vent, stack, exit, or opening from the building containing the welding operations.

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

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

3.3.8 *Tier 3 requirements for opacities exceeding 20%.* For each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded exceeds 20%, the permittee must comply with the following requirements.

- The permittee must submit a report of exceedence of 20% opacity, along with the required annual certification and compliance report, as specified in §63.11519(b)(8), and according to the requirements of §63.11519(b)(1).
- Within 30 days of the opacity exceedence, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in the Site-Specific Welding Emissions Management Plan requirements. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this requirement, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
- During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with the requirements of this permit, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9).
- The permittee must include these records in the required annual certification and compliance report, according to the requirements of §63.11519(b)(1).

3.3.9 *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan must comply with the following requirements.

- Company name and address;
- A list and description of all welding operations which currently comprise this facility;
- A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;
- A list and description of all management practices and/or fume control methods currently employed for this facility;

- A description of additional management practices and/or fume control methods to be implemented and the projected date of implementation; and
 - Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries.
- 3.3.10 The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information and submitted with the required annual certification and compliance report, according to the requirements of §63.11519(b)(1).
- 3.3.11 The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12).

Monitoring and Recordkeeping Requirements

3.4 Visible Emissions Monitoring General Requirements

- 3.4.1 In accordance with 40 CFR 63.11517(a), visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A–7. The permittee must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- 3.4.2 In accordance with 40 CFR 63.11517(b), visual determinations of fugitive emissions must be performed in accordance with the following requirements:
- *Daily Method 22 Testing.* Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
 - *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation.
 - *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee must resume weekly EPA Method 22 testing.
 - *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests, the permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee must resume monthly EPA Method 22 testing.

3.5 Visible Emissions Monitoring Requirements for Welding Operations

- 3.5.1 In accordance with 40 CFR 63.11517(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 facility is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.
- 3.5.2 In accordance with 40 CFR 63.11517(d), *visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* The permittee must perform visual determination of emissions opacity in accordance with the following requirements.

- *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests does not exceed 20% for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20% is detected during any of these tests, the permittee must resume testing every day of operation of the process.
- *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20% for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20% is detected during any monthly test, the permittee must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.
- *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed 20% for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20% is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process.
- *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed does not exceed 20%, the permittee may resume EPA Method 22 testing. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests.

3.6 **General Recordkeeping**

3.6.1 The permittee must collect and keep records of the data and information specified as follows:

- Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
- Records of the applicability determinations listing equipment included at the facility, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

3.6.2 *Visual determination of fugitive emissions records.* The permittee shall maintain a record of the information specified below for each required visual determination of fugitive emissions in accordance with §63.11517(a).

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

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

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

- The permittee shall maintain a record of the manufacturer's specifications for the control devices used to comply with the requirements of this subpart §63.11516.

3.6.4 The facility general operations records must be maintained according to the following requirements.

- The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, corrective action, report, or record.
- The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining three years.

3.7 **Welding Operations Recordkeeping**

3.7.1 *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* The permittee must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii).

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

3.7.3 *Manufacturer's instructions.* If the facility complies with this subpart by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review.

3.7.4 *Welding Rod usage.* If the facility is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the permittee must maintain records demonstrating the facility's welding rod usage on a rolling 12-month basis.

The facility welding operations records must be maintained according to the following requirements:

- The facility records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years.

Notification Requirements

3.8 General Notification Requirements

- 3.8.1 *Initial Notification.* For an existing affected source, the permittee must submit the Initial Notification no later than July 25, 2011. The Initial Notification must provide the following information.
- The name, address, phone number and e-mail address of the owner and operator;
 - The address (physical location) of the facility;
 - An identification that the facility is subject to Subpart XXXXXX; and
 - 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.
- 3.8.2 *Notification of compliance status.* The permittee must submit a notification of compliance status on or before November 22, 2011. The permittee is required to submit the following information:
- The company's name and address;
 - 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;
 - The date of the notification of compliance status.
- 3.8.3 *Annual certification and compliance reports.* The permittee must prepare and submit annual certification and compliance reports for each affected source according to the following requirements. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA.
- 3.8.4 *Dates.* Unless the Administrator (EPA) has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," the permittee must prepare and submit each annual certification and compliance report according to the dates specified as follows. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
 - Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
 - Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.
- 3.8.5 *General requirements.* The annual certification and compliance report must contain the information specified as follows, and the information specified in the following requirements for fugitive emissions requirements.
- Company name and address;
 - Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in

the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- 3.8.6 *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified for each facility which performs visual determination of fugitive emissions in accordance with §63.11517(a), “Monitoring requirements.”
- The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - A description of the corrective actions taken subsequent to the test; and
 - The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

- 3.8.7 *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), “Monitoring requirements.”
- The date of every visual determination of emissions opacity;
 - The average of the six-minute opacities measured by the test; and
 - A description of any corrective action taken subsequent to the test.

3.9 Notification Requirements for Welding Operations

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

4. GENERAL PROVISIONS

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

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

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

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

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]