

Statement of Basis

**Permit to Construct No. P-2012.0021
Project ID 62523**

**Southern Fabrication Works, LLC
Burley, Idaho**

Facility ID 031-00050

Final

December 4, 2020

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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 Fabrication Works, LLC 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

SFW preps some manufactured equipment. Preparation is accomplished using an abrasive blaster. Abrasive blasting is conducted in an enclosed booth, with a single exhaust stack. Particulate from abrasive blasting is controlled by a filter which achieves approximately 91% control.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

July 30, 2020	P-2012.0021, Facility Name Change, Permit status (A, but will become S upon issuance of this permit)
June 4, 2015	P-2012.0021, Permit to Construct (PTC) revision to clarify the welding rod use limits in the current permit, Permit status (S)
July 13, 2012	P-2012.0021, Initial Permit to Construct (PTC) for the facility, Permit status (S)

Application Scope

This PTC is a revised permit to construct (PTC) at an existing minor facility.

The applicant has proposed to:

- Remove the paint booth
- Remove the paint booth heaters

Application Chronology

October 5, 2020	DEQ received an application.
October 6, 2020	DEQ received an application fee.
October 14, 2020	DEQ determined that the application was complete.
October 14, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
November 30, 2020	DEQ received the permit processing fee.
December 4, 2020	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment	Emission Point ID No.
<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>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, 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. 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. Five natural gas space heaters located throughout the facility calculated emission estimates using AP-42 Chapter 1, Section 4.

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).

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources					
Welding Operations	0.40	-	-	-	-
Abrasive Blasting	4.00	-	-	-	-
Natural Gas Heaters	0.0252	0.0020	0.3117	0.1327	0.0182
Total, Point Sources^(a)	4.43	0.002	0.31	0.13	0.02

a) Uncontrolled emissions were taken from Statement of Basis issued July 10, 2012. There is no material usage change in this permitting action, only the removal of the paint booth and paint booth heaters.

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)
Arsenic	1.51E-07
Beryllium	9.09E-09
Cadmium	8.33E-07
Chromium (VI)	2.58E-05
Nickel	2.70E-05
Formaldehyde	5.68E-05
POM	4.89E-08
Total	0.00011

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.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

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

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	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 ^(c)	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
Natural Gas Heaters	0.006	0.0252	0.0005	0.0020	0.071	0.3117	0.0303	0.1327	0.004	0.0182
Pre-Project Totals	0.18	0.78	0.001	0.01	0.14	0.61	0.05	0.21	4.48	19.63

- 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 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}		SO ₂		NO _x		CO		VOC	
	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)
Welding Operations	0.09	0.40	-	-	-	-	-	-	-	-
Abrasive Blasting	0.08	0.35	-	-	-	-	-	-	-	-
Natural Gas Heaters	0.006	0.0252	0.0005	0.0020	0.071	0.3117	0.0303	0.1327	0.004	0.0182
Post Project Totals	0.18	0.78	0.0005	0.002	0.07	0.31	0.03	0.13	0.004	0.02

- 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.

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	
	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	0.18	0.78	0.001	0.01	0.14	0.61	0.05	0.21	4.48	19.63
Post Project Potential to Emit	0.18	0.78	0.0005	0.002	0.07	0.31	0.03	0.13	0.004	0.02
Changes in Potential to Emit	0.00	0.00	0.00	-0.01	-0.07	-0.30	-0.02	-0.08	-4.48	-19.61

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)
Chromium III	5.09E-05	5.09E-05	0	0.033	No
Hexane	1.4E-03	1.4E-03	0	12	No
Pentane	8.6E-03	2.00E-03	-6.6E-03	118	No
Copper	6.46E-07	6.44E-07	-2.00E-09	1.0E-02	No
Manganese	4.82E-03	4.82E-03	0	3.0E-01	No
Barium	3.33E-06	3.33E-06	0	3.3E-02	No
Molybdenum	8.33E-07	8.33E-07	0	3.0E-01	No
Cobalt	6.62E-06	6.62E-06	0	3.0E-03	No
Selenium	2.43E-08	1.82E-08	-6.10E-09	1.0E-02	No
Vanadium	1.74E-06	1.74E-06	0	3.0E-03	No
Zinc	2.20E-05	2.20E-05	0	7.0E-01	No

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 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	1.71E-04	5.68E-05	-1.00E-04	5.1E-04	No
Arsenic	1.53E-07	1.51E-07	-2.00E-09	1.5E-06	No
Beryllium	1.03E-08	9.09E-09	-1.21E-09	2.8E-05	No
Cadmium	8.34E-07	8.33E-07	-1.00E-09	3.7E-06	No
Chromium VI	2.58E-05	2.58E-05	0	6.0E-07	No
Nickel	2.70E-05	2.70E-05	0	3.0E-05	No
POM	4.89E-08	4.89E-08	0	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.

All changes in emissions rates for carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 9 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
Arsenic	1.51E-07	6.63E-07
Beryllium	9.09E-09	3.98E-08
Cadmium	8.33E-07	3.65E-06
Chromium (VI)	2.58E-05	1.13E-04
Nickel	2.70E-05	1.18E-04
Formaldehyde	5.68E-05	2.0E-04
POM	4.89E-08	4.89E-08
Totals	1.11E-04	4.35E-04

Ambient Air Quality Impact Analyses

No ambient air quality impact analysis was conducted for this project because there is a decrease in emissions with the removal of regulated sources.

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

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.
- UNK = Class is unknown.

Table 10 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	4.43	0.78	100	B
PM ₁₀	4.43	0.78	100	B
PM _{2.5}	4.43	0.78	100	B
SO ₂	0.002	0.002	100	B
NO _x	0.31	0.31	100	B
CO	0.13	0.13	100	B
VOC	0.02	0.02	100	B
HAP (single)	4.89E-08	1.18E-04	10	B
Total HAPs	1.11E-04	4.35E-04	25	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed modified 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 58.01.01.401 Tier 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 58.01.01.775)

IDAPA 58.01.01.775 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 2.5 and 2.9.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM 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.

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 PM₁₀, SO₂, NO_x, CO, VOC, 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 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.

GACTION 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. Subpart, MMMM was 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 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?

b) 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.

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 fenceline or property border nearest to the outdoor dry abrasive blasting operation.

(B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"

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

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

(B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

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.

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

(iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), “Monitoring Requirements,” using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

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

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

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

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

(A) Company name and address;

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

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

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

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

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

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

(iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records

in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

In the event, SFW uses greater than 2,000 pounds of welding rod per year sections 3 through 8 apply. Permit Condition 3.3 accounts 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 ensure 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 Condition 3.8.

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

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

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

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) 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 Condition 3.8.

(8) Exceedances 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 exceedance 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 exceedance occurred; and

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

Should there be any exceedances 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 revised permit that have been added, revised, modified or deleted as a result of this permitting action. The General Provision permit conditions from the current template have been incorporated into this permitting action.

Existing Table 1.1

The paint booth and associated heaters were removed from this table to reflect the requested change.

Existing Permit Condition 2.1

Was revised to reflect the removal of all coating operations and associated diesel-fired paint booth heaters.

Existing Permit Condition 2.2

Was revised to reflect the removal of the paint booth and associated diesel-fired heaters.

Initial Permit Condition 2.3

This permit condition was placed into the permit in this permitting action, however the emissions were based off of the emissions and material usage listed in the existing statement of basis issued July 10, 2012. The only exception is that the coating emissions listed in the July 10, 2012 statement of basis have been removed and updated in this permitting action to reflect the current emissions at the facility.

Existing Permit Condition 2.4

This permit condition was 2.3, however upon adding the emission limit table it became permit condition 2.4. This permit condition was revised by removing the coating operations. This also caused existing permit condition 2.4, 2.5, 2.6, 2.7, to become 2.5, 2.6, 2.7, and 2.8

Existing Permit Condition 2.6

Was revised to reflect there are only five space heaters which shall combust natural gas only.

Existing Permit Conditions 2.8 and 2.9

These permit conditions were removed as they were specific to the coating operations. This caused existing permit conditions 2.10, 2.11, 2.12, and 2.13 to become 2.9, 2.10, 2.11, and 2.12.

Existing Permit Condition 2.10

Was revised to reflect the removal of the coating operations.

Existing Permit Conditions 2.14

This permit condition was removed as it was specific to the coating operations. This caused existing permit condition 2.14 to become 2.13.

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – EMISSIONS INVENTORIES

Criteria Pollutant Maximum PTE With Existing Controls

POTENTIAL TO EMIT FOR NSR REGULATED POLI

Emissions Unit	NOX T/yr	SO2 T/yr
Welding Operations	-	-
Abrasive Blasting	-	-
Shop Space Heaters	0.311730857	0.00199
Total	0.312	0.002

LUTANTS

CO T/yr	VOC T/yr	Pb T/yr	PM T/yr	PM10 T/yr	PM2.5 T/yr
-	-	1.29E-06	-	0.40	0.40
-	-	-	2.46	0.35	0.26
0.132651	0.01824	1.66E-06	0.025204	0.025204	0.025204
0.133	0.018	0.000	2.487	0.774	0.679

APPENDIX B – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Southern Field Welding
Address: 238 West 35 South
City: Burley
State: Idaho
Zip Code: 83318
Facility Contact: Timbri Hurst
Title: Human Resource Manager/Safety
AIRS No.: 333241

- N**
- Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

- Y**
- Did this permit require engineering analysis? Y/N

- N**
- Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0.3	-0.3
SO ₂	0.0	0.01	0.0
CO	0.0	0.08	-0.1
PM10	0.0	0	0.0
VOC	0.0	19.61	-19.6
Total:	0.0	20	-20.0
Fee Due	\$ 1,000.00		

Comments: