

## **GENERAL AIR CONTAMINANT DISCHARGE PERMIT**

Department of Environmental Quality  
Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204-1390  
Telephone: (503) 229-5359

This permit is issued in accordance with the provisions of ORS 468A.040 and OAR 340-216-0060

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### **ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

Signed copy on file at DEQ Headquarters Office

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Andy Ginsburg, Air Quality Division Administrator

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Dated

<b>Table 1 Code</b>	<b>Source Description</b>	<b>NAICS<sup>1</sup></b>
Part B, 49	Large Metal Fabrication and Finishing Operations; Area sources engaged in one of the following operations: (1) Electrical and Electronic Equipment Finishing Operations; (2) Fabricated Metal Products; (3) Fabricated Plate Work (Boiler Shops); (4) Fabricated Structural Metal Manufacturing; (5) Heating Equipment, except Electric; (6) Industrial Machinery and Equipment Finishing Operations; (7) Iron and Steel Forging; (8) Primary Metal Products Manufacturing; and (9) Valves and Pipe Fittings	332110, 332111, 332112, 332113, 332114, 332115, 332116, 332117, 332118, 332119, 332312, 332313, 332410, 332420, 332618, 332919, 332999, 333120, 333132, 333414, 333911, 335312, 335999

<sup>1</sup> This table is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely to be effected by this permit.

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## **1.0 PERMIT ASSIGNMENT**

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing metal fabrication activities listed on the cover page of this permit, including supporting activities.
  - b. The permittee uses materials that contain or have the potential to emit metal fabrication and finishing HAP (MFHAP). MFHAP are compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. 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.
  - c. The permittee performs one or more of the following operations:
    - i. Dry abrasive blasting performed in a vented enclosure or of objects greater than 8 feet (2.4 meters) in any one dimension that uses materials that contain MFHAP or has the potential to emit MFHAP.
    - ii. Spray-applied painting operation using MFHAP containing paints.
    - iii. Welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP and uses 2,000 pounds or more per year of MFHAP containing welding wire and rod (calculated on a rolling 12-month basis).
  - d. A Simple or Standard ACDP is not required for the source.
  - e. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Excluded Activities and Operations** This permit does not apply to research or laboratory activities, tool or equipment repair operations, facility maintenance, or quality control activities.
- 1.3 Assignment** DEQ will assign qualifying permittees to this permit that have and maintain a good record of compliance with DEQ's Air Quality regulations and that DEQ determines would be appropriately

- regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the requirements of this permit.
- 1.4 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Simple or Standard ACDP or General ACDP Attachment(s), if applicable.
- 1.5 Relation to Local Land Use Laws** This permit is not valid in Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation in Lane County, contact Lane Regional Air Protection Agency for any necessary permits at (541) 736-1056. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

## **2.0 GENERAL EMISSION STANDARDS AND LIMITS**

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour.
  - b. In Clackamas, Columbia, Multnomah, or Washington Counties, emissions from any air contaminant source other than fuel burning equipment must not equal or exceed 20% opacity for a period aggregating more than 30 seconds in any one hour.
- 2.2 Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions, such as but not limited to:
- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
  - b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
  - c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.

- 2.3 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. DEQ will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.4 Nuisance and Odors** The permittee must not allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by DEQ personnel.

### **3.0 OPERATION AND MAINTENANCE REQUIREMENTS**

- 3.1 NESHAP Compliance Dates** For an existing affected source, the permittee must achieve compliance with the applicable provisions by July 25, 2011. For a new affected source, the permittee must achieve compliance with the applicable provisions upon startup.
- 3.2 Dry Abrasive Blasting** The permittee must comply with the requirements in Conditions 3.3 through 3.5, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP 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.
- 3.3 Dry Abrasive Blasting Performed in Totally Enclosed and Unvented Blast Chambers** For abrasive blasting chambers that are totally enclosed and unvented, the permittee must implement management practices to minimize emissions of MFHAP. These management practices are as follows:
- a. The permittee must minimize dust generation during emptying of abrasive blasting enclosures; and
  - b. The permittee must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.
- 3.4 Dry Abrasive Blasting Performed in Vented Enclosures** For dry abrasive blasting operations, which have a vent allowing any air or blast material to escape, the permittee must comply with the following requirements. 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 Condition 3.5.

- a. The permittee must capture emissions and vent them to a filtration control device. The permittee must operate the filtration control device according to manufacturer's instructions and 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 Condition 6.4.
- b. The permittee must implement the management practices to minimize emissions of MFHAP as follows:
  - i. The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
  - ii. The permittee must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
  - iii. The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

**3.5 Dry Abrasive  
Blasting of  
Objects Greater  
than 8 Feet (2.4  
meters) in any  
One Dimension**

For dry abrasive blasting operations which are performed on objects greater than 8 feet in any one dimension, the permittee may implement management practices to minimize emissions of MFHAP, as specified in Condition 3.5a instead of the practices required by Condition 3.4. The permittee must demonstrate that management practices are being implemented by complying with the requirements in Conditions 3.5b through 3.5d.

- a. Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are as follows:
  - i. The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
  - ii. The permittee must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and
  - iii. The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and
  - iv. The permittee must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

- v. Whenever practicable, the permittee must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.
- b. The permittee must perform visual determinations of fugitive emissions, as specified in Condition 5.2, according to the following, as applicable.
  - i. 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.
  - ii. 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.
- c. 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 Condition 6.2.
- d. If visible fugitive emissions are detected, the permittee must perform corrective actions until the visible fugitive emissions are eliminated, at which time the permittee must comply with the following requirements:
  - i. The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.1.
  - ii. The permittee must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by Condition 7.3c.

### **3.6 Machining**

The permittee must implement management practices to minimize emissions of MFHAP as follows for each machining operation that uses materials that contain MFHAP 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.

- a. The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- b. The permittee must operate all equipment associated with machining according to manufacturer's instructions.

**3.7 Dry Grinding and Dry Polishing with Machines**

The permittee must comply with the following requirements for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP 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.

- a. The permittee must capture emissions and vent them to a filtration control device. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in Condition 6.4.
- b. The permittee must implement management practices to minimize emissions of MFHAP as follows:
  - i. The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
  - ii. The permittee must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

**3.8 Spray Painting**

The permittee must implement the following management practices 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.

- a. Spray painting. All spray-applied painting of objects must meet the following requirements. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

- i. Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- ii. All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". The test coating for measuring filter efficiency must be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter must be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- iii. The permittee must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in Condition 6.5.
- iv. As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of Conditions 3.8a.i through 3.8a.iii.

- b. Spray painting application equipment of all objects painted. All paints applied via spray-applied painting must be applied with a high-volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the EPA Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002".
- c. Spray system recordkeeping. The permittee must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in Condition 6.7.
- d. Spray gun cleaning. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.
- e. Spray painting worker certification. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in Condition 3.8f. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 3.8f. The requirements of this condition do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

The requirements of this condition do not apply to operators of robotic or automated painting operations.

- f. Spray painting training program content. The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by Condition 3.8e. The training program must include, at a minimum, the following items:
- i. A list of all current personnel by name and job description who are required to be trained;
  - ii. Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
    - Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
    - Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
    - Routine spray booth and filter maintenance, including filter selection and installation.
    - Environmental compliance with the requirements of this permit.
  - iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 3.8f.ii are not required to provide the initial training required by that condition to these painters.
- g. Records of spray painting training. The permittee must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in Condition 6.8.

- h. Spray painting training dates. As required by Condition 3.8e, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the following dates.
  - i. If the source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 3.8f.ii satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
  - ii. If the source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 3.8f.ii, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- i. Duration of training validity. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

### 3.9 Welding

The permittee must comply with the requirements in Conditions 3.9a and 3.9b for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. If the welding source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the permittee must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in Conditions 3.9c through 3.9h.

- a. 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 Condition 6.4.

- b. The permittee must implement one or more of the following management practices 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 according to the manufacturer's specifications.
- c. Tier 1 compliance requirements for welding. The permittee must perform visual determinations of welding fugitive emissions as specified in Condition 5.2 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 Condition 6.2.
- d. Requirements upon initial detection of visible emissions from welding. If visible fugitive emissions are detected during any visual determination required in Condition 3.9c, the permittee must comply with the following requirements:
  - 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 Condition 3.9b. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.1 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 Condition 7.3c.
- e. 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:
- i. 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 Condition 5.3 at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - ii. In lieu of the requirement of Condition 3.9c to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with Condition 5.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - iii. The permittee must keep a record of each visual determination of emissions opacity performed in accordance with Condition 3.9e.i or 3.9e.ii, along with any subsequent corrective action taken, in accordance with the requirements in Condition 6.3.
  - iv. The permittee must report the results of all visual determinations of emissions opacity performed in accordance with Condition 3.9e.i or 3.9e.ii, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by Condition 7.3d.
- f. 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 Condition 3.9e for which the average of the six minute average

opacities recorded is 20 percent 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 in accordance with Condition 3.9b.

- g. Tier 3 requirements for opacities exceeding 20 percent. For each visual determination of emissions opacity performed in accordance with Condition 3.9e for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee must comply with the following requirements:
- i. The permittee must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in Condition 7.3e and according to the requirements of Condition 7.3.
  - ii. Within 30 days of the opacity exceedence, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Condition 3.9h. If having already prepared a Site-Specific Welding Emissions Management Plan in accordance with this condition, the permittee 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, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Condition 5.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - iv. The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with Condition 3.9g.iii, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in Condition 7.3j.
  - v. The permittee must include these records in the annual certification and compliance report, according to the requirements of Condition 7.3.

- h. Site-Specific Welding Emissions Management Plan. The Site-Specific Welding Emissions Management Plan must comply with the following requirements:
- i. Site-Specific Welding Emissions Management Plan must contain the following information:
    - Company name and address;
    - A list and description of all affected welding operations;
    - 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 the welding affected source;
    - A description of additional management practices and/or fume control methods to be implemented pursuant to Condition 3.9g.ii, 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.
  - ii. The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by Condition 3.9h.i and submitted with your annual certification and compliance report, according to the requirements of Condition 7.3.
  - iii. 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 Condition 6.10.

## 4.0 PLANT SITE EMISSION LIMITS

### 4.1 Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
VOC	39	tons per year
Single HAP	9	tons per year
Combined HAPs	24	tons per year

- 4.2 Annual Period** The annual plant site emissions limits apply to any 12-consecutive calendar month period.

## **5.0 COMPLIANCE DEMONSTRATION**

- 5.1 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. 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.
- 5.2 Visual Determination of Fugitive Emissions, Graduated Schedule** Visual determinations of fugitive emissions must be performed in accordance with Condition 5.1 and according to the following schedule:
- a. 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.
  - b. Weekly Method 22 Testing. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with Condition 5.2a 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, in accordance with Condition 5.2a.
  - c. Monthly Method 22 Testing. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with Condition 5.2b, 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 in accordance with Condition 5.2b.
  - d. Quarterly Method 22 Testing. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with Condition 5.2c, 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 in accordance with Condition 5.2c.

- 5.3 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 must be thirty minutes.
- 5.4 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 Condition 5.3 and according to the following schedule.
- a. 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.
  - b. 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 Condition 5.4a does not exceed 20 percent 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 percent is detected during any of these tests, the permittee must resume testing every day of operation of the process according to the requirements of Condition 5.4a.
  - c. 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 Condition 5.4b 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 Condition 5.4b.
  - d. 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 Condition 5.4c does not exceed 20 percent 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 percent is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process according to the requirements of Condition 5.4c.

- e. 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 Condition 5.4c does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in Conditions 5.4c and 5.4d. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with Conditions 5.4c and 5.4d.

**5.5 VOC and HAP PSEL Compliance Monitoring for Surface Coating Operations PSEL Compliance Monitoring**

Compliance with the VOC and HAP PSELs is determined for each 12-consecutive calendar month period based on material throughput for the reporting period.

- a. Facilities will be presumed to be in compliance with the yearly VOC and HAP PSELs provided total VOC and HAP containing coating and solvent consumption does not exceed 2,500 gallons during any 12-consecutive calendar month period.
- b. If the permittee exceeds the total VOC and HAP containing coating and solvent consumption stated above, the permittee must demonstrate compliance with the yearly VOC and HAP PSELs on a monthly basis as follows:

$$E_{\text{VOC or HAP}} = [\sum(C_X * K_X)] \times 1 \text{ ton}/2000 \text{ pounds}$$

where,

$E_{\text{VOC or HAP}}$  = VOC or HAP emissions (tons/yr);

C = Material usage for the period in gallons (gals);

K = VOC or HAP content of the material (pounds/gal);

X = Subscript X represents a specific material.

**6.0 RECORDKEEPING REQUIREMENTS**

**6.1 General Compliance and Applicability Records**

Maintain the following information for each affected source.

- a. Each notification and report that is submitted to comply with this permit, and the documentation supporting each notification and report.
- b. Records of the applicability determinations listing equipment included in the 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.

- 6.2 Visual Determination of Fugitive Emissions Records** Maintain a record of the following information for each affected source which performs visual determination of fugitive emissions in accordance with Condition 5.1.
- a. The date and results of every visual determination of fugitive emissions;
  - b. A description of any corrective action taken subsequent to the test; and
  - c. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- 6.3 Visual Determination of Emissions Opacity Records** Maintain a record of the following information for each affected source which performs visual determination of emissions opacity in accordance with Condition 5.3.
- a. The date of every visual determination of emissions opacity; and
  - b. The average of the six-minute opacities measured by the test; and
  - c. A description of any corrective action taken subsequent to the test.
- 6.4 Manufacturer's Specifications** Maintain a record of the manufacturer's specifications for the control devices used to comply with Conditions 3.2 through 3.9.
- 6.5 Spray Paint Booth Filter Records** Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with Conditions 3.8a.ii and 3.8a.iii.
- 6.6 Waterspray Booth or Water Curtain Efficiency Tests** Maintain a record of the water curtain efficiency demonstrations performed in accordance with Condition 3.8a.iv.
- 6.7 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 Condition 3.8c. This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If having obtained written approval for an alternative spray application system in accordance with Condition 3.8b, the permittee must maintain a record of that approval along with documentation of the demonstration of equivalency.

- 6.8 Employee Training Documentation Records** Maintain certification that each worker performing spray painting operations has completed the training specified in Condition 3.8f with the date the initial training and the most recent refresher training was completed.
- 6.9 Visual Determination of Emissions Opacity** 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 Condition 3.9g.iii.
- 6.10 Site-Specific Welding Emissions Management Plan** If required to prepare a plan in accordance with Condition 3.9g.ii, the permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan and it must be readily available for inspector review.
- 6.11 Manufacturer's Instructions** If complying with this permit by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review.
- 6.12 Material Usage or Emissions** The permittee must maintain records of annual emissions and/or annual coating and solvent usage, as applicable (see Condition 5.5), including the VOC and HAP content of each coating and solvent used.
- 6.13 Metal Processed** The permittee must maintain records demonstrating the amount of metal processed in tons on an annual basis.
- 6.14 Fuel Usage** The permittee must maintain records demonstrating fuel usage on an annual basis.
- 6.15 Abrasive Usage** The permittee must maintain records demonstrating abrasive material usage in pounds on an annual basis.
- 6.16 Welding Rod Usage** The permittee must maintain records demonstrating welding rod usage in pounds on an annual basis.
- 6.17 Excess Emissions** The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.
- 6.18 Retention of Records** The permittee must maintain files of all information required by this permit in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may

be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

**6.19 Complaint Log**

The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

**7.0 REPORTING REQUIREMENTS**

**7.1 Initial Notification**

The permittee must submit an Initial Notification in accordance with 40 CFR 63.11519(a)(1). A form for this purpose is available from DEQ. The notification must be submitted to the appropriate DEQ office and EPA's Region X Office.

- a. For existing sources, this notification must be submitted on or before July 25, 2011;
- b. For new sources, this notification must be submitted within 120 days after initial startup.

**7.2 Notification of Compliance Status**

The permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.11519(a)(2). A form for this purpose is available from DEQ. The notification must be submitted to the appropriate DEQ office and EPA's Region X office.

- a. For existing sources, this notification must be submitted on or before November 22, 2011;
- b. For new sources, this notification must be submitted within 120 days after initial startup.

**7.3 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.

- a. Dates. The permittee must prepare and submit each annual certification and compliance report according to the following dates. 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

annual 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 exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.
- b. General requirements. The annual certification and compliance report must contain the following information and the information specified in 6.2 and 6.3 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.
- c. Visual determination of fugitive emissions requirements. The annual certification and compliance report must contain the following information for each affected source which performs visual determination of fugitive emissions in accordance with Condition 5.1.
- 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.
- d. Visual determination of emissions opacity requirements. The annual certification and compliance report must

contain the following information for each affected source which performs visual determination of emissions opacity in accordance with Condition 5.3.

- 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.
- e. Exceedences of 20 percent opacity for welding affected sources. As required by Condition 3.9g.i, the permittee must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must contain the following information:
- i. The date on which the exceedence occurred; and
  - ii. The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- f. Welding rod usage. The total welding rod usage, in pounds, for the previous calendar year.
- g. Metal processed. The total metal processed, in tons, for the previous calendar year.
- h. Fuel usage. The fuel usage, for the previous calendar year.
- i. Abrasive material usage. The total abrasive material usage, in pounds, for the previous calendar year.
- j. 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 Condition 3.9g.iv and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to Condition 3.9h along with the annual certification and compliance report, according to the requirements in Condition 7.3.
- k. Emissions or coating and solvent usage. Annual VOC and HAP containing coating and solvent usage or annual emissions, as applicable (see Condition 5.5).

#### **7.4 Excess Emissions**

The permittee must notify DEQ by telephone or in person of any excess emissions which are of a nature that could endanger public health.

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 8.3.
- b. If the excess emissions occur during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by DEQ.

- 7.5 Initial Startup Notice** The permittee must notify DEQ in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.
- 7.6 Notice of Change of Ownership or Company Name** The permittee must notify DEQ in writing using a DEQ “Permit Application Form” within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
  - b. Sale or exchange of the activity or facility.
- 7.7 Construction or Modification Notices** The permittee must notify DEQ in writing using a DEQ “Notice of Construction Form,” or “Permit Application Form,” and obtain approval before:
- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
  - b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
  - c. Making any physical change which increases emissions; or
  - d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.
- 7.8 Where to Send Reports and Notices** Except in Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington Counties, reports and notices, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 8.2. In Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington Counties, reports and notices, with the permit number prominently displayed, must be sent to the Gresham Office as identified in Condition 8.3.

## 8.0 ADMINISTRATIVE REQUIREMENTS

- 8.1 Reassignment to the General ACDP** A complete application for reassignment to this permit is due within 60 days after the permit is reissued. DEQ will notify the permittee when the permit is reissued. The application must be sent to the appropriate regional office.
- a. If DEQ is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
  - b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until DEQ takes final action on the Simple or Standard ACDP application.
  - c. If a complete application for reassignment to the General ACDP or Simple or Standard ACDP is filed with DEQ in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.
- 8.2 Permit Coordinator Addresses** All applications should be directed to the Permit Coordinator for the area where the source is located. The Permit Coordinator addresses are as follows:

Counties	Permit Coordinator Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987 Telephone: (503) 229-5582
Benton, Coos, Curry, Douglas, Jackson, Josephine, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Western Region 750 Front Street NE, Suite 120 Salem, OR 97301-1039 Telephone: (503) 378-5305
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, Wheeler	Department of Environmental Quality Eastern Region 475 NE Bellevue Dr., Suite 110 Bend, OR 97701 Telephone: (541) 633-2021

### 8.3 DEQ Contacts

Information about air quality permits and the Department’s regulations may be obtained from the DEQ web page at [www.oregon.gov/DEQ](http://www.oregon.gov/DEQ). All inquiries about this permit should be directed to the regional office for the area where the source is located. The Department’s regional offices are as follows:

Counties	Office Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Gresham Office 1550 NW Eastman Parkway, Suite 290 Gresham, OR 97030 Telephone: (503) 667-8414
Benton, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Salem Office 750 Front Street NE, Suite 120 Salem, OR 97301-1039 Telephone: (503) 378-8240
Coos, Curry, and Western Douglas	Department of Environmental Quality Coos Bay Office 340 N Front Street Coos Bay, OR 97420 Telephone: (541) 269-2721
Eastern Douglas, Jackson, and Josephine	Department of Environmental Quality Medford Office 221 Stewart Avenue, Suite 201 Medford, OR 97501 Telephone: (541) 776-6010
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler	Department of Environmental Quality Bend Office 475 NE Bellevue Dr., Suite 110 Bend, OR 97701 Telephone: (541) 388-6146

## 9.0 FEES

### 9.1 Annual Compliance Fee

The Annual Compliance Determination Fee specified in OAR 340-216-0020, Table 2, Part 2(c)(B) for a Class One or Two General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date.

### 9.2 Change of Ownership or Company Name

The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company of a source

- Fee** assigned to this permit.
- 9.3 Where to Submit Fees** Fees must be submitted to:  
Department of Environmental Quality  
Business Office  
811 SW Sixth Avenue  
Portland, Oregon 97204-1390

## **10.0 GENERAL CONDITIONS AND DISCLAIMERS**

- 10.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by DEQ.
- 10.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 10.4 DEQ Access** The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 10.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6 Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.
- 10.7 Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 10.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 10.9 Modification or Revocation** The Commission may modify or revoke this permit pursuant to OAR 340-216-0060(3) and (4).

## 11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	Lb	pound(s)
AQMA	Air Quality Maintenance Area	NESHAP	National Emissions Standards for Hazardous Air Pollutants
calendar year	The 12-month period beginning January 1st and ending December 31st	NO <sub>x</sub>	nitrogen oxides
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
CO	carbon monoxide	ORS	Oregon Revised Statutes
DEQ	Oregon Department of Environmental Quality	PM	particulate matter
EPA	US Environmental Protection Agency	PM <sub>10</sub>	particulate matter less than 10 microns in size
ft <sup>3</sup>	cubic feet	PSEL	Plant Site Emission Limit
Gal	gallon(s)	SIC	Standard Industrial Code
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SO <sub>2</sub>	sulfur dioxide
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

jce: 03/28/11

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