



Lane Regional Air Protection Agency

GENERAL
 AIR CONTAMINANT DISCHARGE PERMIT
 ASSESSMENT REPORT
 METAL FABRICATION AND FINISHING

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from metal fabrication facilities subject to the Nine Metal Fabrication and Finishing NESHAP (40 CFR part 63 subpart XXXXXX). The Nine Metal Fabrication and Finishing NESHAP regulates facilities primarily engaged in the following operations that 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.

SIC Code	Description
3462	Iron and Steel Forging Iron and Steel Forging
3499	Fabricated Metal Products, NEC Fabricated Metal Products, NEC
3441	Fabricated Structural Metal Manufacturing Fabricated Structural Metal Fabrication
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3443	Fabricated Plate Work (Boiler Shops) Fabricated Plate Work and Boiler Shops
3399	Primary Metals Products Manufacturing Primary Metals Products Manufacturing
3494	Valves and Pipe Fittings, NEC Valves and Pipe Fittings, NEC
3499	Fabricated Metal Products, NEC Fabricated Metal Products, NEC
3531	Industrial Machinery & Equipment: Finishing Ops Construction Machinery Manufacturing
3533	Industrial Machinery & Equipment: Finishing Ops Oil and Gas Field Machinery Equipment Manufacturing
3433	Heating Equipment, except electric Heating Equipment, except electric
3561	Industrial Machinery & Equipment: Finishing Ops Pumps and Pumping Equipment Manufacturing
3621	Electrical & Electronic Equipment Finishing Ops Motors and Generators Manufacturing
3699	Electrical & Electronic Equipment Finishing Ops Electrical Machinery, Equipment, and Supplies, NEC

*Note: SIC codes can be used to determine regulatory applicability. NAICS codes alone cannot be used to determine applicability for Lane County sources.

2. This General Permit does not apply to:
 - Research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air

Act (CAA)

- Tool or equipment repair operations, facility maintenance, or quality control activities as defined in 40 CFR 63.11522
 - Operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration
 - Operations that produce military munitions, as defined in 40 CFR 63.11522, or equipment directly and exclusively used for the purposes of transporting military munitions.
3. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities as defined under LRAPA title 12. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
 4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.
 5. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

6. Facilities assigned to this General Permit are sources of particulate matter (PM) and hazardous air pollutant (HAP) emissions. These facilities may also be sources of volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxides (NO_x) and sulfur dioxides (SO₂) emissions.
7. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources of federal hazardous air pollutants and compliant with applicable emission limits.
8. LRAPA has assessed the level of emissions from these facilities and determined that facilities assigned to this permit do not have the potential to emit at or above the established Significant Emission Rates (SERs) stated in Table 2 of LRAPA title 12 for

carbon monoxide, nitrogen oxides, particulate matter, PM10 and sulfur oxides. However, facilities assigned to this permit will be required to track and report abrasive material, welding rod and wire, fuel usage, and the amount of metal processed. If LRAPA determines that facilities assigned to this permit have the potential to emit at or above the established levels of concern, the permit will be revised to ensure that these facilities emit at or below the levels of concern.

SPECIFIC AIR PROGRAM APPLICABILITY

9. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA titles 32, 48, and 49. The permit contains requirements and limitations to ensure compliance with these standards.
10. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 CFR part 63 subpart XXXXXX, for Metal Fabrication and Finishing Facilities. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on April 3, 2008. The NESHAP is adopted in LRAPA title 44.
11. The Nine Metal Fabrication and Finishing NESHAP contains options for graduated schedules of visual determination of fugitive emissions (Condition 7.2) and visual determination of opacity for welding emissions (Condition 7.4). The language of the NESHAP appears to assume a five (5) day work week and is not clear how the graduated schedule works for a six (6) or seven (7) day work week. LRAPA interprets the rule to be either, once every five days or one calendar week of operation (Condition 7.2.b and Condition 7.4.b). This interpretation carries forward to the monthly, (once every 21 days or one month of operation) (Condition 7.2.c and Condition 7.4.c), and quarterly testing, (once per 60 days or 3 months of operation) (Condition 7.2.d and Condition 7.4.d), as well.
12. Oregon DEQ conducted a general activity-based risk screening for metal fabrication and finishing sources assigned to their General Permit for facilities subject to the Nine Metal Fabrication and Finishing NESHAP. Facilities that conduct welding activities using the specified materials above thresholds are required to utilize a fume capture and control system before exceeding the applicable threshold.

COMPLIANCE ASSURANCE

13. Permittees are required to maintain records of notifications, production, compliance, visual emission determinations, manufacturer's specifications for equipment, spray paint and booth production and maintenance, material usage, work practice activities, and complaints received at the facility related to air pollution concerns. These items are reported to LRAPA annually, as applicable.

14. LRAPA staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCATION OF ASSIGNMENT

15. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

16. General Air Contaminant Discharge Permits are authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public will be provided at least 30 days to submit written comments on the draft General Permit and may request a public hearing. If a public hearing is requested, a notice of when and where the hearings will be held will be provided at least 30 days in advance of the public hearing. LRAPA will review any comments and may modify the General Permit in response to the comments. The final General Permit will be issued after approval by the LRAPA Director.

DEFINITIONS

17. The terms not defined in the General Permit use the definitions found in LRAPA title 12 or 40 CFR part 63 subpart XXXXXX.

AQGP-025r, 6X Metal Fabrication and Finishing ACDP RevRept
cnc 10/19/21:rr