

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: October 18, 2021 Effective Date: November 2, 2021

Expiration Date: October 18, 2026

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 26-00520

Natural Minor

Federal Tax Id - Plant Code: 84-0608431-1

Owner Information

Name: NOBELCLAD A DMC CO

Mailing Address: PO BOX 317

1138 INDUSTRIAL PARK DR MOUNT BRADDOCK, PA 15465-0317

Plant Information

Plant: NOBELCLAD A DMC CO/MT BRADDOCK FAC

Location: 26 Fayette County 26912 Dunbar Township

SIC Code: 3441 Manufacturing - Fabricated Structural Metal

Responsible Official

Name: JAISON KENNEY Title: HR/HSE MGR

Phone: (724) 620 - 5013 Email: jkenney@nobelclad.com

Permit Contact Person

Name: JAISON KENNEY Title: HR/HSE MGR Phone: (724) 620 - 5013

ne: (724) 620 - 5013 Email: jkenney@nobelclad.com

[Signature]

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION





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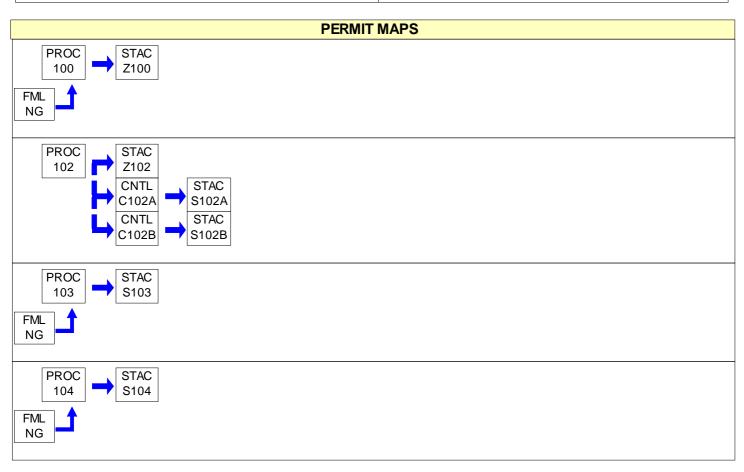
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
100	HEAT TREATING FURNACE (13.5 MMBTU/HR, NG-FIRED)		
102	PLASMA CUTTING MACHINE		
103	CAR BOTTOM FURNACE (9 MMBTU/HR, NG)		
104	"OUTDOOR" HEAT TREATING FURNACE (10 MMBTU/HR)		
105	5 NG-FIRED AIR HEATERS (9.7 MMBTU/HR, TOTAL)		
C102A	PLASMA CUTTER NORTH DUST COLLECTOR		
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NG	NATURAL GAS		
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PROC STAC S105 FML NG





#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
 - (1) For a synthetic minor facility, a fee equal to:
 - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.





- (2) For a facility that is not a synthetic minor, a fee equal to:
 - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
 - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
 - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:







(1) Enforcement action

26-00520

- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:





- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)





- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such



records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.





I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) (8) N/A.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(5), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) The permittee may not permit fugitive particulate matter from sources specified in paragraph's (a)(1)-(9) if the emissions are visible at the point the emissions pass outside the person's property.
- (c) Contained under WORK PRACTICE REQUIREMENTS in this section of the permit.
- (d) N/A.

003 [25 Pa. Code §123.13]

Processes

Particulate matter emissions into the outdoor atmosphere from any process shall not exceed 0.04 gr/dscf as specified in 25 Pa. Code § 123.13(c)(1)(i).

004 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

005 [25 Pa. Code §123.31]

Limitations

- (a) N/A.
- (b) A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is





being operated.

(c) N/A.

006 [25 Pa. Code §123.41]

Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

007 [25 Pa. Code §129.14]

Open burning operations

- (a) In air basins. Not Applicable.
- (b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health
- (c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) (5) N/A.
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.
- (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
- (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to





the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) N/A.

- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b).
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[The Mt. Braddock Facility is not located in an air basin.]

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this Permit may be in excess of the limitations specified in, or established pursuant to the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with Title 25 PA Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The operators of the Mt. Braddock Facility shall conduct upwind/downwind dustfall monitoring, should the Department request this sampling.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An inspection of the all air contamination sources at the facility shall be conducted at a minimum of once each day that sources at the facility are operating. The facility-wide inspection shall be conducted for the presence of the following:

- 1. Visible stack emissions:
- 2. Fugitive emissions; and
- 3. Potentially objectionable odors at the property line.

These observations are to ensure continued compliance with source-specific visible emission limitations, fugitive emissions prohibited under 25 Pa. Code § 123.1 or 25 Pa. Code § 123.2, and malodors prohibited under 25 Pa. Code § 123.31. Observations for visible stack emissions shall be conducted during daylight hours and all observations shall be conducted while sources are in operation. If visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the Owner/Operator shall take corrective action. These observations determine whether, or not, these conditions exist. They do not quantify the level of existing conditions. Therefore, the observations for presence, or lack of, visible emissions do not require that they be performed by a person certified as a qualified observer for EPA Method 9 for Visual Determination of the Opacity of Emissions from Stationary Sources. Equipment at the plant shall not operate in violation of 25 Pa. Code § 123.1 and 25 Pa. Code § 123.2.





IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All logs and required records shall be maintained for a minimum of five years. These records must be kept on site for a minimum of two years. They may be stored at an alternative location acceptable to the Department, for the remaining time. All records shall be made available to the Department upon request.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all visible stack, fugitive emission, and potentially objectionable odors at the property line surveys, performed. The records shall include the date, time, name, and title of the observer, whether emissions or malodors were observed, and any corrective action taken as a result.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records, on a monthly basis, of the natural gas fuel usage by the facility, amount of material processed, and hours of operation of the emission processes. These records shall be used monthly, to calculate material processing for the previous 12-month period.

014 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed informed by indirect means.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a. The permittee shall report malfunctions or incidents of excess emissions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner.
- b. When the malfunction or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction or incident of excess emissions. The owner/ operator shall submit a written or emailed report of instances of such malfunctions or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- c. The report shall describe the following:
- 1. Name and location of the facility.
- 2. Nature and cause of the malfunction or incident.
- 3. Time when the malfunction or incident was first observed.
- 4. Expected duration of excess emissions.
- 5. Estimated rate of emissions.
- 6. Corrective actions or preventative measures taken.
- d. Any malfunction or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five business days of discovery. The report shall contain the same information required by paragraph (c) above.
- e. The Owner/Operator shall notify the Department in writing or by e-mail within five business days of when corrective measures have been accomplished.



- f. The Department does not require a source to cease operations during an emergency, if continued operation is necessary. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility, including acts of God, which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- g. During an emergency an owner or operator may continue to operate the source at their discretion provided they follow all the notification and reporting requirements in accordance with paragraphs (b)-(e), as applicable.
- h. An emergency can potentially be used as an affirmative defense in an enforcement action brought by the Department for noncompliance situations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - 1. An emergency occurred, and that the facility owner or operator can identify the cause(s) of the emergency;
 - 2. The equipment at the facility causing the emergency was at the time being properly operated and maintained;
- 3. During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - 4. The facility owner or operator notified the Department in accordance with paragraphs b e, as applicable.
- i. In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof. The Department will evaluate the information submitted to determine if an emergency occurred and will exercise its enforcement discretion in appropriate cases.
- j. Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager at the location below:

PA DEP Office of Air Quality 400 Waterfront Drive Pittsburgh, PA 15222-4745 412-442-4000

016 [25 Pa. Code §135.3]

Reporting

- (a) A person who owns or operates a source to which this chapter applies (Chapter 135 Emission Statements), and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.
- (b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report with 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.
- (c) N/A.

[At the time of renewal of this Operating Permit, NobelClad had not been advised by the Department to submit an annual source report.]

VI. WORK PRACTICE REQUIREMENTS.

017 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:





- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

[Paragraphs (a), (b), and (d) of this regulatory section are contained in Condition #002.]

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All air contamination sources and air cleaning devices at the facility shall be operated and maintained in accordance with manufacturer's specification and good air pollution and engineering practices.

VII. ADDITIONAL REQUIREMENTS.

019 [25 Pa. Code §123.42]

Exceptions

Limitations of opacity shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in § 123.1 (a)(1)-(9) (relating to prohibition of certain fugitive emissions).
- (4) N/A.

020 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Mass emissions may be determined using engineering calculations based on fuel and raw material purchase records, manufacturers specifications, AP-42 emission factors, source test results, operating records, material balance methods, and/or other applicable methods with written Departmental approval.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Sources at the facility are subject to the applicable requirements of the following regulation and shall comply with all applicable notification and reporting requirements contained in 40 CFR, Part 63, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.).

In accordance with 40 CFR § 63.13, copies of all requests, reports, applications, submittals and other communications







shall be forwarded to both the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection at the addresses shown below, unless otherwise noted:

Director, Air Protection Division Environmental Protection Agency Region III Mail Code 3AP00 1650 Arch Street Philadelphia, PA 19103-2029 PA Department of Environmental Protection Regional Air Quality Program Manager 400 Waterfront Drive Pittsburgh, PA 15222-4745

This permit contains language from the Code of Federal Regulations (CFR). Should the wording of the federal citations of the conditions in this permit be changed in the CFR, the new wording shall supersede the language of this permit.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

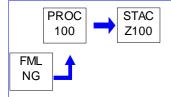




Source ID: 100

Source Name: HEAT TREATING FURNACE (13.5 MMBTU/HR, NG-FIRED)

Source Capacity/Throughput:



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

MONITORING REQUIREMENTS. III.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

RECORDKEEPING REQUIREMENTS. IV.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

WORK PRACTICE REQUIREMENTS. VI.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

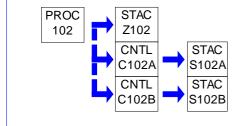




Source ID: 102 Source Name: PLASMA CUTTING MACHINE

Source Capacity/Throughput:

Conditions for this source occur in the following groups: G01



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

TESTING REQUIREMENTS. II.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

MONITORING REQUIREMENTS. III.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

WORK PRACTICE REQUIREMENTS. VI.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

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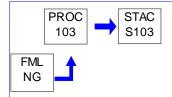




Source ID: 103

Source Name: CAR BOTTOM FURNACE (9 MMBTU/HR, NG)

Source Capacity/Throughput:



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

MONITORING REQUIREMENTS. III.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

RECORDKEEPING REQUIREMENTS. IV.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

WORK PRACTICE REQUIREMENTS. VI.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

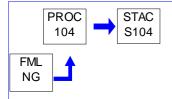




Source ID: 104

Source Name: "OUTDOOR" HEAT TREATING FURNACE (10 MMBTU/HR)

Source Capacity/Throughput:



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

MONITORING REQUIREMENTS. III.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

RECORDKEEPING REQUIREMENTS. IV.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

WORK PRACTICE REQUIREMENTS. VI.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

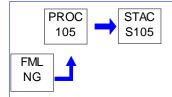
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



Source ID: 105

Source Name: 5 NG-FIRED AIR HEATERS (9.7 MMBTU/HR, TOTAL)

Source Capacity/Throughput:



26-00520

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).







Group Name: G01

Group Description: Processes Subject to 40 CFR Part 63, Subpart XXXXXX

Sources included in this group

26-00520

ID	Name
102	PLASMA CUTTING MACHINE

RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11514]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal **Fabrication and Finishing Source Categories**

Am I subject to this subpart?

- (a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"
 - (1) (3) N/A.
 - (4) Fabricated Structural Metal Manufacturing;
 - (5) (9) N/A.
- (b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than





or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

- (1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.
- (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.
 - (3) (4) N/A.
- (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.
- (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.
- (d) (i) N/A.

[Note 1: Table 1 to Subpart XXXXXX of Part 63-Description of Source Categories Affected by This Subpart states:

For Metal fabrication and finishing source category: Fabricated Structural Metal Manufacturing

Description: Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.

Note 2: The Sandblast Building (Source ID 101) and the Plasma Cutting Machine (Source ID 102) are subject to the applicable requirements of 40 CFR Part 63 - Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and are existing sources for the purposes of the subpart.]

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11515]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

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.

(b) N/A.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11516]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

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) N/A.
- (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

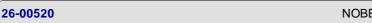


or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this 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.
 - (3) N/A/
- (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.
- (c) (e) N/A.
- (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.
- (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."

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11517]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories





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.
- (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.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11519]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

What are my notification, recordkeeping, and reporting requirements?

- (a) N/A.
- (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.
 - (3) N/A.
- (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.
- (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.
 - (7) N/A.
- (8) Exceedances of 20 percent opacity for welding affected sources. As required by $\S 63.11516(f)(7)(i)$, "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.
- (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.
- (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?"
 - (5) (10) N/A.
- (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.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11522]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

• • •

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.





Cartridge collector means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge collectors can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

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Control device means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

Dry abrasive blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

...

Facility maintenance means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

Filtration control device means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

Grinding means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Metal fabrication and finishing source categories are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

...

Primarily engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal



fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

Responsible official means responsible official as defined in 40 CFR 70.2.

Vented dry abrasive blasting means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

Welding means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

26-00520





SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.







SECTION H. Miscellaneous.

- 1. The capacities/throughputs and other information listed in Section A, D, and F, excluding those in permit restrictions, are for informational purposes only and are not enforceable limits.
- 2. The following description is for information purposes only:

This State Only Operating Permit (SOOP) authorizes NobelClad, A DMC Company to operate a metals cladding facility at their Mt. Braddock Facility, located in Mt. Braddock Township, Fayette County.

The facility primarily clads metals.

3. Air contamination sources at the Facility are as follows:

Heat Treating Furnace (13.5 MMBtu/hr, NG-fired. Plasma Cutting Machine.
Car Bottom Furnace (9 MMBtu/hr, NG).
"Outside" Heat Treating Furnace (10 MMBtu/hr).
5 NG-fired Air Heaters (9.6 MMBtu/hr, NG).
Parts Washer.

4. Air pollution controls at the Facility are as follows:

Cartridge Filter Dust Collectors controlling emissions from the Plasma Cutting Machine.

5. The following emission sources at the facility are insignificant:

One, 0.2 MMBtu/hr, NG Hot Water Heater. One Parts Washer.

6. PA DEP methodology for duration of observation and reduction of visual opacity data observed in accordance with EPA Reference Test Method 9: The observer shall record observations in accordance with EPA Reference Test Method 9 for minimum of 60 minutes. The data reduction methodology differs from EPA Reference Test Method 9 in that it does not require a single continuous time interval and does not average datum of individual observations. Visual observations in accordance with EPA Reference Test Method 9 take place every 15 seconds and are recorded for this time interval. Since the observations of 20%, or greater, can be during multiple intervals, the number of high opacity observation readings are merely counted. For an emission limitation of opacity not to exceed 20% for a period aggregating more than three minutes in any 1 hour, a total of 13 observations greater than 20% would exceed this standard.





***** End of Report *****