

MARICOPA COUNTY AIR QUALITY DEPARTMENT

Engineering and Permitting Division

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AIR QUALITY PERMIT TO OPERATE AND/OR CONSTRUCT

(As required by Title 49, Chapter 3, Article 2, Section 49-480, Arizona Revised Statutes)

A R I Z O N A
ISSUED TO

**MR Steel Acquisition Corp.
4100 W. Glenrosa Ave
Phoenix, 85019**

This air quality permit to operate and/or construct does not relieve the applicant of the responsibility of meeting all air pollution regulations.

THE PERMITTEE IS SUBJECT TO THE SPECIFIC AND GENERAL CONDITIONS IDENTIFIED IN THIS PERMIT.

PERMIT NUMBER: 160035

REVISION DATE: _____

REVISION NUMBER: 0.0.0.0

EXPIRATION DATE: _____

DRAFT

Todd Martin, Non-Title V Permit Supervisor

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Any cited regulatory paragraphs or section numbers refer to the version of the rules and regulations that were in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise. However, in the event the rules and regulations are amended during the term of this Permit, the amended rules and regulations shall apply to this Permit. Whenever the term, Control Officer, is used in this Permit it shall be interpreted to mean, Control Officer or designated representative. Where the term "Rule" appears, it shall be construed to mean "Maricopa County Air Pollution Control Regulations" unless otherwise noted.

SPECIFIC CONDITIONS

FACILITY-WIDE REQUIREMENT

1. Allowable Emissions:

- a. The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Twelve Month Rolling Total Emission Limits
Volatile Organic Compounds (VOC)	6,200 lbs
Any Single Hazardous Air Pollutant (HAP)	500 lbs
Total Hazardous Air Pollutants (HAPs)	250 lbs
Particulate Matter (PM)	14,995 lbs
Particulate Matter <10 Micron Diameter (PM10)	14,855 lbs
Particulate Matter <2.5 Micron Diameter (PM2.5)	14,735 lbs

- b. The 12-month rolling total emissions shall be calculated monthly by the end of the following month by summing the emissions over the most recent 12 calendar months. The Permittee shall keep this emission record on-site for inspection or submittal upon request.

[Rule 220 §302.2][Locally Enforceable Only]

2. Opacity

No person shall discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20% opacity for a period aggregating more than three minutes in any 60-minute period.

- a. If any non-compliant visible emissions (excluding water vapor) are detected or reported, the Permittee shall determine the cause and/or the source of emissions. The Permittee shall then take immediate corrective action(s) and if necessary, shut down the applicable equipment. If visible emissions (excluding water vapor) exceed the above opacity standards subsequent to implementing corrective action(s), the Permittee shall shut down the applicable equipment and institute repairs or changes necessary to ensure compliance prior to resuming operations.
- b. Compliance with the opacity requirement shall be determined by observations of visible emissions conducted in accordance with EPA Reference Method 9 as modified by EPA Reference Method 203B.

[Rule 300 §§301, 501]

STEEL COATING OPERATIONS

3. Operational Limitation:

The Permittee shall not use a spray-applied coating containing compounds in excess of the following without first submitting a permit revision together with an initial notification to the Department, ATTN: Permitting Manager, and meeting all 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 (Subpart 6X).

- a. Chromium (Cr), lead (Pb), nickel (Ni), or cadmium (Cd), if those compounds comprise 0.1% or more of the coating by mass.

- b. Manganese (Mn), if those compounds comprise 1.0% or more of the coating by mass.
[40 CFR §§63.11514, 63.11519(a)(1)][Rule 220 §403]

4. Controls:

The Permittee shall comply with the following controls:

- a. The Permittee shall conduct all spray coating operations inside of a painting enclosure.
[Rule 315 §301][Locally Enforceable Only]
- b. Equipment Operated In Enclosures Located Outside a Building: Spray coating equipment shall be operated inside an enclosure which has at least three complete walls or complete sides curtains a minimum of eight feet in height and able to contain any object or objects being coated.
 - i. Three-Sided Enclosures: Spray shall be directed in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
 - ii. More Complete Enclosures: For enclosures with three sides and a roof or complete enclosures, spray shall be directed into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.
[Rule 315 §301.1][Locally Enforceable Only]
- c. Any spray booth or enclosure with forced air exhaust vented directly outside shall be equipped with exhaust filters which are certified by the manufacturer and accepted by the Control Officer as having a minimum over spray removal efficiency of at least 92% for similar types of applications. The Permittee shall install and maintain the exhaust filters in accordance with the manufacturer's recommendations, with no gaps or visible openings.
[Rule 315 §301.2] [Locally Enforceable Only]
- d. Reasonable Stack Height Required: Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.
[SIP Rule 32.D] [Rule 320 §303]

5. Exemptions:

The controls required in Permit Condition 4 shall not apply to the following:

- a. Spray coating of buildings or dwellings, including appurtenances and any other ornamental objects that are not normally removed prior to coating.
- b. Spray coating of facility equipment or structures which are fixed in a permanent location and cannot easily be moved into an enclosure or spray booth and which are not normally dismantled or moved prior to coating.
- c. Spray coating of objects which cannot fit inside of an enclosure with internal dimensions of 10'W X 25'L X 8'H.
- d. Enclosures and spray booths and exhausts located entirely in a completely enclosed building, providing that any vents or openings do not allow overspray to be emitted into the outside air.
- e. To any coating operations utilizing only hand-held aerosol cans.
[Rule 315 §302][Locally Enforceable Only]

6. Material Limitations:

- a. The Permittee shall not apply any surface coating, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contains VOCs in excess of the VOC limits specified in Table 1, except as allowed by Subsection [b] of this Permit Condition:

Table 1 - VOC Limits for Surface Coating

TYPE OF SURFACE COATING	VOC LIMITS AS APPLIED:	
	lbs/gal	g/liter
Metal Can Coating		
Sheet Basecoat (Exterior and Interior) and Overvarnish	2.8	340
Two-Piece Can Exterior (Basecoat and Overvarnish)	2.8	340
Two and Three-Piece Can Interior Body Spray	4.2	510
Two-Piece Can Exterior End (Spray or Roll Coat)	4.2	510
Three-Piece Can Side-Seam Spray	5.5	660
End Sealing Compound	3.7	440
Can Printing Ink	2.5	300
Metal Coil Coating (any coat)	2.6	310
Metal Furniture Coating	3.0	360
Large Appliance Coating	2.8	340
Other Metal Parts and Products Coating (non-adhesives coatings, adhesives, adhesive primers, caulking, and beaded sealants; excludes adhesives used to bond impact resistant rubber lining to metal)		
Air-Dried Coating	3.5	420
Baked Coating [above 200°F (93°C)]	3.0	360
Silicone Release Coating: Baked or Air-Dried	3.5	420
Adhesives for Bonding Impact Resistant Rubber Lining to Metal	7.1	850
Fabric Coating	2.9	350
Film Coating	2.9	350
Coating Plastic Parts and Products that are Not Defined as Flexible	3.5	420
Coating Flexible Plastic Parts and Product		
Primer	4.1	490
Color Topcoat	3.8	450
Basecoat/Clear Coat (Combined System) – Limit for either coat	4.5	540
Paper Coating, including Adhesives	2.9	350
Vinyl Coating (Coating on Vinyl)	3.8	450
Strippable Booth Coatings	2.0	240

[SIP Rule 336 §§ 301, 305.5] [Rule 345 §§303.1, 303.2, 303.3]

- b. The following materials are not subject to the VOC limits in Subsection [a] of this Permit Condition:
- i. Leak-Preventing Materials: Sealants, adhesives, caulking, and similar materials used on the following substrates for the primary purpose of leak prevention:
 - 1) Non-metallic substrates; and
 - 2) Used substrates, post manufacture, such as, but not limited to, old joints and seals on pipe and valve assemblies.
 - ii. Adhesive Use: Adhesive and adhesive primer applications except those listed in Subsection [a] of this Permit. Any adhesive exempted in Rule 336 and to which no other rule specifically applies shall comply with the provisions of Rule 330.
 - iii. Certain Joint Fillers: Caulking and beaded sealants used to fill gaps or to fill joints between surfaces except those used in manufacturing other metal parts and products as defined in Rule 336, Section 231 or in the manufacturing of cans.
 - iv. Coating with a non-refillable aerosol can.
 - v. Touch up or repair-coating operations as defined in Rule 336, Sections 249 and 239.
 - vi. Low usage coatings, which in aggregate of all formulations, do not exceed 55 gallons (208 liters)

per year facility-wide if the operator updates usage-records of these coatings on each day of their use.

[SIP Rule 336 §§ 305.2, 305.4][Rule 345 §312.3]

- vii. Pretreatment acid etchant for coating mobile equipment is limited to 780 g/liter VOC (6.5 lbs/gal).
[Rule 345 §303.3]

7. Application Methods for Surface Coatings:

- a. The Permittee shall employ one of the following for all applications of surface coating containing more than 2 pounds of VOC per gallon (240 g/liter) minus exempt compounds, except as permitted in Subsection [b] of this Permit Condition:

- i. A low-pressure spray gun; or
- ii. An electrostatic system; or
- iii. A system that atomizes principally by hydraulic pressure, including "airless" and "air assisted airless"; or
- iv. Non-atomizing or non-spraying application methods, such as but not limited to dipping, rolling, or brushing; or
- v. Any method which is approved by the Administrator of the Federal EPA and the Control Officer as having a transfer efficiency of 65% or greater.

[SIP Rule 336 § 302][Rule 345 §307.1]

- b. The Permittee may employ spray guns otherwise prohibited by Subsection [a] of this Permit Condition for use with coatings over 2 lb VOC /gal under the following limited conditions:

- i. To coat the inside of pipes and tubes with a wand-style applicator.
- ii. Using an airbrush or other small gun that has a reservoir capacity not exceeding 250 cc (8.8 fluid ounces) and is used solely for detailing, lettering, touchup, and/or repair.
- iii. Coating using materials listed in Permit Condition 6.b.

[SIP Rule 336 §§ 305.2, 305.4, 305.7]

- c. The Permittee is allowed to use spray gun other than one allowed by Subsection [a] of this Permit Condition for mobile equipment coating under the following conditions:

- i. For applying materials that have a VOC content not exceeding 3.0 lbs/gal as applied, less water and non-precursor compounds.
- ii. If such guns are designed and used solely for detailing and touch up with a maximum reservoir capacity of 8.8 fluid ounces (250 cc).
- iii. If such guns are used to apply adhesives.

[Rule 345 §307.2][Locally Enforceable Only]

8. Cleanup of Application Equipment:

- a. Surface coating operations other than mobile equipment coating:

The Permittee shall comply with all of the following when using VOC-containing material to clean application equipment used for all surface coatings (except mobile equipment coating):

- i. The Permittee shall disassemble any spray gun and other application equipment and cleaned it in:
 - 1) A container which remains covered at all times, except when the application equipment is being handled in the container, or transferred into or out of the container; or
 - 2) A commercially-sold gun cleaning machine which shall be operated and maintained as stipulated in an Operation and Maintenance (O&M) Plan or according to manufacturer's or distributor's instructions.

- ii. The Permittee shall only use cleaning solvent that has a VOC-vapor pressure, as used, below 35 mm Hg at 20° C (68° F), except for sprayless equipment in which the same principal solvent is used for cleaning as is used in the coating.

[SIP Rule 336 §§ 303, 305.6]

b. Mobile equipment coating:

The Permittee shall use a gun cleaning machine to clean all paint guns used to coat mobile equipment parts. Manual cleaning outside of the cleaning machine is allowed if done as an adjunct to the cleaning machine function and is done without spraying cleaning solvent with the gun. A cleaning machine is not required if water is used to clean the gun or the cleaning mixture is more than ½ water by weight or volume.

i. The gun cleaning machine shall:

- 1) Be designed to clean paint guns and be kept in proper repair and free from liquid leaks.
- 2) Have at least one pump which drives cleaning solvent through and over the gun, and a basin which permits containment of the cleaning solvent.
- 3) Have all covers and other surfaces that are exposed to gaseous or liquid VOC solvent be impervious to both gaseous and liquid VOC solvent.

ii. All Automatic gun cleaning machines:

- 1) Shall be self-covering or enclosed when not loading or unloading.
- 2) Shall have a self-closing cover or other self-enclosing feature which in the cover's closed position allows no gaps exceeding 1/8 inch (3 mm) between the cover and the cabinet.
- 3) Shall be designed to prevent operation of its mechanical cleaning feature unless it is completely covered or enclosed to the gap limit of 1/8 inch.

iii. All non-automatic remote reservoir gun cleaning machines:

- 1) Shall be designed such that cleaning solvent drains from the work space quickly and completely into a remote reservoir when the work space is not in use.
- 2) Shall have total reservoir openings, including the drain opening(s), of two square inches or less.
- 3) Are allowed to be designed in a way such that the base of the work space functions as the reservoir's top surface, as long as the fit or seal between the sink base and the reservoir container allows the reservoir to meet the opening limit of two square inches or less.

[Rule 345 §310][Locally Enforceable Only]

9. Surface Preparation and Surface Cleaning Fluids:

- a. Dip cleaning any surface using a VOC-containing solvent is subject to Rule 331 (Solvent Cleaning).

[Rule 345 §305.3][Rule 331 §§ 102, 308.1(c)(2)]

b. Mobile equipment coating:

- i. A person cleaning or preparing a surface of mobile equipment for coating using a wipe method or other non-dip method shall use a material with a VOC content of no more than 1.4 pounds of VOC per gallon, as applied.

[Rule 345 §305.1][Locally Enforceable Only]

- ii. Mobile equipment surface preparation liquids and surface cleaning liquids that contain VOCs shall not be applied in a mist or finely atomized spray.

[Rule 345 §305.2][Locally Enforceable Only]

10. VOC Containment and Disposal:

The Permittee shall take all reasonable measures to keep VOCs from evaporating into the atmosphere

including, but not limited to:

- a. All materials from which VOCs can evaporate, including coatings, waste coatings, fresh solvent, used solvent, waste solvent and solvent soaked rags and residues shall be stored in closed containers when not in use. Such containers one gallon and larger shall be legibly labeled with their contents. VOC-containing materials shall be disposed of in closed containers.
- b. All containers and mixing tanks containing VOCs shall be leak-free and shall be kept covered when not in use.
- c. The Permittee shall implement procedures to minimize spills of any VOC-containing material during handling and transfer to and from containers, enclosed systems, waste receptacles and other equipment.
- d. All VOC-containing materials including VOC-containing cleaning materials shall be conveyed from one location to another in labeled, closed containers or pipes.
- e. Disposal of waste or surplus VOC-containing materials shall be done in a manner that inhibits VOC evaporation, such as having these materials hauled off site in sealed containers.
- f. Tanks used for stripping off coating or for cleaning objects shall be covered when not in use. Solvent drag-out shall be minimized by tilting or rotating the object to drain off any pools of solvent before removing the object from above the tank.

[SIP Rule 336 §304][Rule 345 §§ 309, 311]

11. Reporting:

Should the Permittee meet or exceed any of the following annual quantities, the Control Officer must be notified of this fact in writing by February 28 of the following year:

- a. Used a total of 1,000 gallons of mobile equipment coating (with reducer and hardener); or
- b. Received a total of 1,300 gallons of mobile equipment cleaning solvents, lacquer thinner and wash thinner; or
- c. Disposed of more than 1,000 gallons or 6,000 pounds of materials from mobile equipment coating to a hazardous waste collection facility.

[Rule 345 §402][Locally Enforceable Only]

12. Recordkeeping:

The Permittee shall comply with the recordkeeping and reporting requirements of this Permit Condition. Records can consist of but are not limited to purchase orders, invoices, receipts, usage records, MSDS, and hazardous wastes manifests. Any records required by this Permit Condition shall be retained for five years and be made available to the Control Officer upon request. Records may be kept in either electronic or paper format.

- a. Current Materials List: The Permittee shall maintain a current list of coatings, adhesives, reducers, thinners, gun-cleaning materials, additives, and any other VOC-containing materials used for surface coating stating the VOC content of material for each as received (before thinning).
 - i. Material Name: Record the name/code/manufacture and the appropriate material type category of coatings, adhesives, thinners, cleaning solutions, and any other VOC-containing materials used.
 - ii. VOC Content: The VOC content of each material listed as pounds of VOC per gallon, grams of VOC per liter, or percent VOC by weight along with the specific gravity or density (2 numbers are required).
 - iii. Product Data Sheet: Specific mixing instructions and the VOC content as applied for products requiring dilution.
- b. Applicator Cleanup Solvent: The Permittee shall have a hardcopy of the VOC vapor pressure (VP) at 20°C (68°F) of solvent(s) used to clean spray guns, hoses, reservoirs, and any other coating application equipment. Any one of the following ways of providing the VP data is sufficient:
 - i. A current manufacturer's technical data sheet;

- ii. A current manufacturer's safety data sheet (MSDS);
 - iii. Actual test results;
 - iv. Calculations using certified data from a laboratory or manufacturer revealing the exact formulation; or
 - v. A letter signed by an official or lab manager of the supplying facility.
[SIP Rule 336 §501.1]
- c. For all coatings (except those recorded each day of use per Permit Condition 6.b.vi., low usage allowance), the Permittee shall make the following listings for coatings and adhesives that have VOC limits pursuant to Permit Condition 6.a:
- i. VOC before Reducing: The VOC content of each coating as received, minus exempt compounds. If the coating is a multi-part coating, list the VOC content which the manufacturer states the coating will have once all necessary parts have been mixed together in the proportions specified by the manufacturer.
[SIP Rule 336 §501.1c (1)(a)]
 - ii. List Maximum VOC Content of Coating as Applied: For each coating that the Permittee thins/reduces or adds any additive to, the Permittee shall record in a permanent log either of the following:
 - 1) The maximum number of fluid ounces thinner/reducer that is ever added to a gallon of unreduced coating (or maximum g/liter), and the maximum fluid ounces of every other additive mixed into a gallon of the coating; or
 - 2) The VOC content of the coating, after adding the maximum amount of thinner/reducer and other additives that would ever be added, as determined by the formula in Rule 336, Section 255.1.
[Rule 336 §501.1c]
- d. The Permittee shall update daily the usage records of each coating that exceeds the limits in Permit Condition 6.a, including any coatings exempted by Permit Condition 6.b.vi. Records shall include the type and amount used of each VOC-containing coating or adhesive. This includes, but is not limited to, thinners, surfacers and diluents.
[SIP Rule 336 §501.2b]
- e. The Permittee shall update monthly usage and disposal records of the type, quantity and VOC content of all VOC-containing materials. These records shall be updated monthly by the end of the following month.
[SIP Rule 336 §501.2b][Rule 345 §501.2]

VOC-Containing Materials

Permit Conditions 13 – 15 are applicable to the band saw cutting fluid and the wipe cleaning solvent.

13. Operational Limitations:

- a. The Permittee shall not heat the band saw cutting fluid.

- b. The Permittee shall discharge no more than 40 pounds of volatile organic compounds into the atmosphere in any one day from the band saw cutting fluid. Upon the request of the Department, the Permittee shall calculate a daily emission rate by dividing the monthly emissions by the number of days of operation for that month.

[Rule 220 §302.2][Locally Enforceable Only]

14. VOC Containment and Disposal:

The Permittee shall not store, discard, or dispose of VOC or VOC-containing material in a way intended to cause or to allow the evaporation of VOC to the atmosphere. Reasonable measures shall be taken to prevent such evaporation which include but are not limited to the following:

- a. All materials from which VOC can evaporate, including fresh solvent, waste solvent and solvent-soaked rags and residues, shall be kept in closed, leak free, impervious containers that are opened only when adding or removing material.
 - i. Porous or absorbent materials used for wipe cleaning shall be stored in closed containers when not in use.
 - ii. Each container shall be clearly labeled with its contents.
- b. If any cleaning solvent escapes from a container:
 - i. Wipe up or otherwise remove immediately if in accessible areas.
 - ii. For areas where access is not feasible during normal production, remove as soon as reasonably possible.
- c. Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

[Rule 330 §306][SIP Rule 32.C][SIP Rule 331 §301]

15. Recordkeeping:

The following records shall be retained for five years and shall be made available to the Control Officer upon request.

- a. Current List: Maintain a current list of solvents and any other VOC-containing materials. The VOC content of each material listed shall be stated as pounds of VOC per gallon, grams of VOC per liter, or percent VOC by weight along with the specific gravity or density (2 numbers are required).

[Rule 330 §503.1][Rule 331 §501.1][Locally Enforceable Only]
- b. Monthly Usage Records: Maintain monthly records of the amount of each coating, adhesive, solvents, solvent used for surface preparation, for cleanup, and for the removal of materials, and any other VOC-containing material used.

[Rule 330 §503.2][Rule 331 §501.2][Locally Enforceable Only]
- c. Discarded Materials: Maintain records of the type, amount, and method of disposing of VOC-containing materials on each day of disposal. Records of hazardous waste disposal shall be kept in accordance with hazardous waste disposal statutes.

[Rule 330 §§ 306.3, 503.4][Locally Enforceable Only]

PLASMA CUTTING

16. Operational limitations:

- a. The Permittee shall only conduct wet plasma cutting where the torch and steel plate are both submerged under water.

- b. The Permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce emissions and operate all equipment associated with plasma cutting according to manufacturer's instructions.

[Rule 220 §302.2][Locally Enforceable Only]

17. Recordkeeping:

The Permittee shall retain a copy of the manufacturer's specifications and make it available to the Control Officer upon request.

[Rule 200 §302.7][Locally Enforceable Only]

ABRASIVE BLASTING

18. Material Limitation:

The Permittee shall limit the use of abrasive blasting material to no more than 5 tons per 12-consecutive month period.

[Rule 220 §302.2][Locally Enforceable Only]

19. Opacity Limitation:

The Permittee shall not discharge into the atmosphere from any abrasive blasting operation any air contaminant for an observation period or periods aggregating more than three minutes in any sixty minute period an opacity equal to or greater than 20 percent. An indicated excess will be considered to have occurred if any cumulative period of 15-second increments totaling more than three minutes within any sixty minute period was in excess of twenty percent opacity. Opacity shall be measured in accordance with EPA Reference Method 9 and the provisions of Rule 312 Section 505.

[Rule 312 §§ 305, 505] [SIP Rule 312 §305]

20. Requirements for Confined Blasting:

Except for hydroblasting and blasting operations identified in Permit Condition 21.a, all abrasive blasting operations shall be performed in a confined enclosure that complies with the requirements of either Section [a] or [b]:

[Rule 312 §§ 204, 301][Locally Enforceable Only]

a. Totally enclosed and un-vented blast chambers:

- i. The Permittee shall minimize dust generation during emptying of abrasive blasting enclosures; and
- ii. The Permittee shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions and shall maintain a record of the manufacturer's specifications at all times.

[40 CFR §63.11516(a)(1)]

b. Vented enclosures:

- i. Blasting shall be directed away from the open side of the structure.
[Rule 312 §204][Locally Enforceable Only]
- ii. Emissions from the blasting operation shall be captured and vented to a filtration control device. The Permittee shall operate the filtration control device according to manufacturer's instructions and shall maintain a record of the manufacturer's specifications for the filtration control devices at all times.
- iii. The Permittee shall implement the following management practices to minimize emissions of MFHAP:
 - 1) Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
 - 2) Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

- 3) Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

[Rule 312 §303][40 CFR §63.11516(a)(2)]

- iv. At the end of the work shift, the Permittee shall clean up spillage, carry-out, and/or trackout of any spent abrasive material with a potential to be transported during a wind event.

[Rule 312 §308.2][Locally Enforceable Only]

21. Requirements for Unconfined Blasting:

- a. Unconfined blasting is allowed only if the item to be blasted exceeds 8 feet in any one dimension.
- b. The Permittee shall implement at least one of the following control measures when unconfined abrasive blasting is performed:
 - i. Wet abrasive blasting, or
 - ii. Vacuum blasting, or
 - iii. Dry abrasive blasting, provided that all of the following conditions are met:
 - 1) Perform only on a metal substrate.
 - 2) Use only certified abrasive for dry unconfined blasting.
 - a) A certified abrasive is defined as an abrasive that has been certified by the California Air Resources Board (CARB).
 - b) An abrasive purchased during the certified period remains certified for use following its expiration date.
 - c) A list of CARB-certified abrasives is available at the following:
<http://www.arb.ca.gov/ba/certabr/eo/eo.htm>
 - 3) Blast only paint that have a lead content less than 0.1 percent.
 - a) Prior to unconfined blasting of paint, the owner or operator must be the generator with firsthand knowledge of lead content in the paint, or retain evidence of the lead level from the material safety data sheet or from a lead test performed in accordance with Rule 312 Section 506.
 - 4) Perform the abrasive blasting operation directed away from unpaved surfaces.
 - 5) Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
 - 6) Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials.
 - 7) Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
 - 8) Not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size.
 - 9) Whenever practicable, switch from high particulate matter (PM)-emitting blasting media (i.e., sand) to a low PM-emitting blasting media (i.e., crushed glass, specular hematite, steel shot, aluminum oxide).
 - 10) Do not perform dry unconfined abrasive blasting operation during a wind event. A wind event is defined as an occurrence when the 60-minute average wind speed is greater than 25 miles per hour.
 - 11) The Permittee shall clean up spent abrasive material with a potential to be transported during

a wind event. Until removal occurs, the Permittee shall, at a minimum, meet the provisions of Rule 310.

[Rule 312 §§200, 301.1, 302, 306, 308.1, 503.2][40 CFR §63.11516(a)(3)]

c. Visual Determinations for Dry Unconfined Abrasive Blasting

- i. The Permittee must perform visual determinations of fugitive emissions, as specified in Permit Condition 27.b, according to the following requirements:
 - 1) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the Permittee shall perform visual determinations of fugitive emissions at the fence line or the property border nearest to the outdoor dry abrasive blasting operation.
 - 2) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the Permittee shall perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
- ii. The Permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with Permit Condition 29.
- iii. If visible fugitive emissions are detected, the Permittee must perform corrective actions until the visible emissions are eliminated, at which time they shall comply with the following requirements:
 - 1) Perform a follow-up inspection for visible fugitive emissions in accordance with Permit Condition 27.a.
 - 2) Report all instances where visible emissions are detected, along with any corrective action taken and the result of the subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by Permit Condition 28.a.

[40 CFR §63.11516(a)(3)]

22. Recordkeeping:

The Permittee shall retain copies of reports, logs, and supporting documentation required by this permit for at least 2 years. At a minimum, the Permittee shall keep the following records of abrasive blasting operations on site:

- a. The date the blasting occurs,
- b. The blasting equipment that is operating,
- c. A description of the type of blasting (confined, unconfined, sand, wet, or other),
- d. The type and amount of solid abrasive material consumed on a monthly basis. Include name of certified abrasive used, as applicable, and
- e. The 12-month rolling total of abrasive material consumed.
- f. Safety Data Sheets (SDS) or results of any lead testing that was performed on paint that is to be removed via unconfined blasting, as applicable.

[Rule 312 §§501, 502][Locally Enforceable Only]

ADDITIONAL REQUIREMENTS FOR STEEL FABRICATION SUBJECT TO 40 CFR 63 SUBPART XXXXXX

23. 40 CFR 63 Subpart XXXXXX Applicability:

In addition to the requirements already specified in this Permit, the Permittee shall comply with Permit Conditions 24 through 29 when performing operations that are subject to 40 CFR 63 XXXXXX, as specified in Subsection [a] of this Permit Condition, unless exempted per Subsection [b] of this Permit Condition.

- a. 40 CFR 63 Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) and the provisions of this Permit Section apply to the following operations if they involve materials that contain or have the

potential to emit Metal Fabrication or Finishing Metal Hazardous Air Pollutants (MFHAP). MFHAP include compounds of cadmium, chromium, lead, manganese, or nickel, or any of these metals in elemental form (with the exception of lead).

- i. Dry abrasive blasting
 - ii. Machining operations
 - iii. Dry grinding and dry polishing with machines
 - iv. Spray painting
 - v. Welding
- b. The provisions of 40 CFR 63 Subpart XXXXXX and this Permit Section do not apply to the following activities:
- i. Operations listed in Subsection [a] of this Permit Condition that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
 - ii. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions.
 - iii. Machining processes using hand-held devices or employing fluids for lubrication or cooling.
 - iv. Hand grinding and polishing operations.
 - v. Quality control activities that are not part of the normal operation, involve a limited sample of products, and do not include the production of an intermediate or final product for sale or exchange for commercial profit.
 - vi. Facility maintenance performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures.

[40 CFR §§63.11514, 63.11522]

24. Standards for Machining:

The Permittee shall comply with the following requirements when performing machining operations that have the potential to emit MFHAP:

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

Machining is defined as: dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling (i.e., underwater machining).

[40 CFR §§ 63.11516(b), 63.11522]

25. Standards for Dry Grinding and/or Dry Polishing with Machines:

The Permittee shall comply with the following requirements when performing dry grinding and/or dry polishing operations which use materials that contain MFHAP or have the potential to emit MFHAP:

- a. Capture and vent emissions to a filtration device. The Permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices.
- b. Implement the following management practices to minimize emissions of MFHAP:
 - i. Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - ii. Operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

Dry grinding and dry polishing with machines is defined as: grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

[40 CFR §63.11516(c), 63.11522]

26. Standards for Welding

The Permittee shall comply with the following requirements for welding operations that use materials that contain MFHAP or have the potential to emit MFHAP.

- a. The Permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The Permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for capture and control devices.

[40 CFR §63.11516(f)(1)]

- b. The Permittee must implement one or more of the following management practices to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment:

- i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
- ii. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
- iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
- iv. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
- v. Use a welding fume capture and control system, operated according to the manufacturer's specifications.

[40 CFR §63.11516(f)(2)]

- c. Tier 1 compliance requirements for welding:

The Permittee shall perform visual determinations of welding fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations in accordance with the requirements of Permit Condition 27.b. The Permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Permit Condition 29.c.

[40 CFR §63.11516(f)(3)]

- d. Requirements upon initial detection of visible emissions from welding:

If visible fugitive emissions are detected during any visual determination required by Subsection [c] of this Permit Condition, the Permittee shall comply with the following requirements:

- i. Perform corrective actions that include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Subsection [b] of this Permit Condition. After completing such corrective actions, the Permittee must perform a follow-up inspection for visible fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations in accordance with Permit Condition 27.a.
- 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 this information with the annual certification and compliance report as required by Permit Condition 28.a.iii.

[40 CFR §63.11516(f)(4)]

- e. Tier 2 requirements upon subsequent detection of visible emissions.

If visible emissions are detected more than once during any consecutive 12 month period (Notwithstanding the results of any follow-up inspections), the Permittee must comply with the following requirements:

- i. Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the Permittee must conduct a visual determination of emissions opacity at the primary vent, stack, exit, or opening from the building containing the welding operations in accordance with Permit Condition 27.c.
- ii. In lieu of the requirement of Subsection [c] of this Permit Condition to perform visual determinations of fugitive emissions with EPA Method 22, the Permittee must perform visual determinations of emissions opacity using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations in accordance with Permit Condition 27.d.
- iii. The Permittee must keep a record of each visual determination of emissions opacity performed in accordance with the above requirements, along with any subsequent corrective action taken, in accordance with the requirements in Permit Condition 29.d.
- iv. The Permittee must report the results of all visual determinations of emissions opacity performed in accordance with the above requirements, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by Permit Condition 28.a.iv.

[40 CFR §63.11516(f)(5)]

- f. Requirements for opacities less than or equal to 20 percent but greater than zero:
For each visual determination of emissions opacity performed in accordance with Subsection [e] of this Permit Condition for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the Permittee must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Subsection [b] of this Permit Condition.

[40 CFR §63.11516(f)(6)]

- g. Tier 3 requirements for opacities exceeding 20 percent:
For each visual determination of emissions opacity performed in accordance with Subsection [e] of this Permit Condition for which the average of the six-minute average opacities recorded exceed 20 percent, the Permittee must comply with the following requirements:
- i. The Permittee must submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report as specified in Permit Condition 28.a.v, and according to the requirements of Permit Condition 28.a.
 - ii. Within 30 days of the opacity exceedance, the Permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Subsection [h] of this Permit Condition. If the Permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this Permit, the Permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - iii. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the Permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Permit Condition 27.d, using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - iv. The Permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with Subsection [g.iii] of this Permit Condition, during preparation of the Site-Specific Welding Emissions Management Plan in accordance with the requirements of Permit Condition 28.a.vi.
 - v. The Permittee must include these records in the annual certification and compliance report

according to the requirements of Permit Condition 28.a.

[40 CFR §63.11516(f)(7)]

h. Site-Specific Welding Emissions Management Plan:

- i. The Site-Specific Welding Emissions Management Plan must contain the following information:
 - 1) Company name and address;
 - 2) A list and description of all welding operations which currently comprise the welding affected source;
 - 3) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - 4) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - 5) A description of additional management practices and/or fume control methods to be implemented pursuant to Subsection [g.ii] of this Permit Condition, and the projected date of implementation; and
 - 6) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to Subsections [h.i.4)] and [h.i.5)] of this Permit Condition.
- ii. The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information and submitted with the annual certification and compliance report, according to the requirements of Permit Condition 28.a.
- iii. The Permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in their records in a readily-accessible location for inspector review, in accordance with the requirements in Permit Condition 29.e.

[40 CFR §63.11516(f)(8)]

27. Monitoring Requirements:

- a. Visual determination of fugitive emissions, general requirements:
Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR Part 60, Appendix A-7. The Permittee must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

[40 CFR §63.11517(a)]
- b. Visual determination of fugitive emissions, graduated requirements:
Visual determinations of fugitive emissions must be performed in accordance with Subsection [a] of this Permit Condition and according to the schedule in the following requirements:
 - i. 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.
 - ii. Weekly Method 22 Testing: If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of work day operation of the process, the Permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the Permittee must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation.

iii. Monthly Method 22 Testing: If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed, the Permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, The Permittee must resume weekly EPA Method 22.

iv. Quarterly Method 22 Testing: If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed, the Permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the Permittee must resume monthly EPA Method 22.

[40 CFR §63.11517(b)]

c. Visual determination of emissions opacity for welding Tier 2 or 3, general requirements: 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.

[40 CFR §63.11517(c)]

d. Visual determination of emissions opacity for welding Tier 2 or 3, graduated requirements: The Permittee must perform visual determination of emissions opacity in accordance with the following requirements:

i. 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.

ii. 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 does not exceed 20 percent for 10 days of operation of the process, the Permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the Permittee must resume testing every day of operation of the process.

iii. 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 does not exceed 20 percent for four consecutive weekly tests, the Permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the Permittee must resume testing every five days of operation of the process.

iv. Quarterly Method 9 testing for welding Tier 2 and 3: If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed does not exceed 20 percent for three consecutive monthly tests, the Permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the Permittee must resume testing every 21 days (month) of operation of the process.

v. Return to Method 22 testing for welding, Tier 2 or 3: If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed does not exceed 20 percent, the Permittee may resume EPA Method 22 testing as in Subsections [b.iii] and [b.iv] of this Permit Condition. In lieu of this, the Permittee may elect to continue performing EPA Method 9 tests in accordance with Subsections [d.iii] and [d.iv] of this Permit Condition.

[40 CFR §63.11517(d)]

28. Reporting Requirements

a. Annual Certification and Compliance Report:

The Permittee shall prepare and submit an annual certification and compliance report that meets the following requirements:

- i. Report dates: Unless the Administrator has approved or agreed to a different schedule for submission of reports, the Permittee must prepare and submit each annual certification and compliance report according to the dates specified below. 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.
 - 1) 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.
 - 2) Each subsequent annual certification and compliance report must cover the subsequent annual reporting period from January 1 through December 31.
 - 3) Each annual certification and compliance report must be prepared and submitted no later than January 31 and be 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.
- ii. General requirements: The report must contain the information specified below:
 - 1) Company name and address;
 - 2) 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
 - 3) 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.
- iii. Visual determination of fugitive emissions requirements: The report must contain the information specified below for each operation in which the Permittee is required to perform a visual determination of fugitive emissions:
 - 1) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - 2) A description of the corrective actions taken subsequent to the test; and
 - 3) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- iv. Visual determination of emissions opacity requirements: The report must contain the information specified below for each operation in which the Permittee is required to perform a visual determination of emissions opacity:
 - 1) The date of every visual determination of emissions opacity;
 - 2) The average of the six-minute opacities measured by the test; and
 - 3) A description of any corrective action taken subsequent to the test.
- v. Exceedances of 20 percent opacity for welding affected sources: The Permittee 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 the annual certification and compliance report and must contain the following information:
 - 1) The date on which the exceedance occurred; and

- 2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
 - vi. Site-specific welding emissions management plan reporting: The Permittee must submit a copy of the records of daily visual determinations of emissions recorded pursuant to Permit Condition 26.g.iv and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan along with the annual certification and compliance report.
[40 CFR §63.11519(b)]
- b. Notifications and reports shall be submitted to:
Maricopa County Air Quality Department, Attn: Permitting Manager, 1001 N. Central Ave., Suite 125, Phoenix, Arizona 85004.

29. Recordkeeping:

The Permittee shall keep the following records for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Record shall be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records offsite for the remaining 3 years.

- a. Each notification and report that is submitted to comply with 40 CFR 63 Subpart XXXXXX and/or Permit Condition 28, and the documentation supporting each notification and report.
- b. Records of the initial applicability determinations of 40 CFR 63 Subpart XXXXXX, 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.
- c. Records of visual determination of fugitive emissions, including the following:
 - 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.
- d. Records of visual determination of emissions opacity, including the following:
 - i. The date of every visual determination of emissions opacity;
 - ii. The average of the six-minute opacities measured by the test; and
 - iii. A description of any corrective action taken subsequent to the test.
- e. Site-Specific Welding Emissions Management Plan: If required to prepare a plan, the Permittee must maintain a copy of it in their records and make it readily available for inspector review. The Permittee must also maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of the plan.
- f. Manufacturer's instructions: If the Permittee complies with this Permit by operating any equipment according to manufacturer's instruction, these instructions must be kept readily available for inspector review.

[40 CFR §63.11519]

FUGITIVE DUST FROM DUST-GENERATING OPERATIONS

30. Applicability:

- a. The provisions of this Permit Section apply to all dust-generating operations except for those dust-generating operations listed in the Condition below. Any person engaged in a dust-generating operation subject to this Permit Section shall be subject to the standards and/or requirements of this Permit Section before, after, and while conducting such dust-generating operation, including during weekends, after work hours, and on holidays.
- b. For the purpose of Rule 310, any control measure that is implemented must achieve the applicable

standard(s) described in Rule 310, as determined by the corresponding test method(s), as applicable, and must achieve other applicable standard(s) set forth in Rule 310.

- c. Regardless of whether a dust-generating operation is in compliance with an approved Dust Control Plan or there is no approved Dust Control Plan, the owner and/or operator of a dust-generating operation shall be subject to all requirements of Rule 310 at all times.
- d. Failure to comply with the provisions of these requirements, as applicable, and/or of an approved Dust Control Plan, shall constitute a violation.

[SIP Rule 310 §§102, 301]

31. Exemptions:

The provisions of this Permit Section shall not apply to the following activities:

- a. Emergency activities that may disturb the soil conducted by any utility or government agency in order to prevent public injury or to restore critical utilities to functional status.
- b. Establishing of initial landscapes without the use of mechanized equipment or conducting landscape maintenance without the use of mechanized equipment. However, establishing initial landscapes without the use of mechanized equipment and conducting landscape maintenance without the use of mechanized equipment shall not include grading or trenching performed to establish initial landscapes or to redesign existing landscapes.

[SIP Rule 310 §103]

32. Collocation:

The Permittee shall not co-locate any crushing & screening, hot mix asphalt plant and/or concrete batch facilities with the equipment covered by this permit as documented in the equipment list. Co-located sources are those located on contiguous or adjacent properties, which are under common control of the Permittee.

[Rule 100 §200.26, Rule 200 §303.3.c]

33. Dust Control Plan Requirements:

The Permittee shall comply with the requirements of the Dust Control Plan and the provisions of MCAQD Rule 310 Sections 301 – 310 at all times.

[SIP Rule 310 §§ 301-310, 409]

34. Visible Emission Requirements for Dust-Generating Operations:

- a. The Permittee shall not cause or allow visible fugitive dust emissions to exceed 20% opacity.
- b. The Permittee shall not cause or allow visible emissions of particulate matter, including fugitive dust, beyond the property line within which the emissions are generated. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined by using EPA Reference Method 22. This requirement does not apply to dust-generating operations conducted within 25 feet of the property line.

[SIP Rule 310 §303.1]

35. Exemptions from Dust-Generating Operation Opacity Limitation Requirement:

- a. If wind conditions cause fugitive dust emissions to exceed the opacity requirements in this permit, despite implementation of the Dust Control Plan, an owner and/or operator shall:
 - i. Ensure that all control measures and requirements of the Dust Control Plan are implemented and the subject violations cannot be prevented by better application, operation, or maintenance of these measures and requirements.
 - ii. Cease dust-generating operations and stabilize any disturbed surface area consistent with the Stabilization Requirements of these conditions.
 - iii. Compile records consistent with the recordkeeping requirements of these Permit Conditions and document the control measure and other Dust Control Plan requirements implemented.
- b. Emergency Maintenance of Flood Control Channels and Water Retention Basins: The opacity limit

shall not apply to emergency maintenance of flood control channels and water retention basins, provided that control measures are implemented.

[SIP Rule 310 §303.2]

36. Stabilization Requirements for Dust-Generating Operations:

- a. Unpaved Parking Lot: The owner and/or operator of any unpaved parking lot shall not allow visible fugitive dust emissions to exceed 20% opacity and shall not allow silt loading equal to or greater than 0.33 oz/ft^2 . However, if silt loading is equal to or greater than 0.33 oz/ft^2 , then the owner and/or operator shall not allow the silt content to exceed 8%. An unpaved parking lot includes any area that is not paved and that is used for parking, maneuvering, material handling, or storing motor vehicles and equipment

[SIP Rule 310 §§ 232, 304.1]

- b. Unpaved Haul/Access Road:

An unpaved haul/access road includes any on-site road or equipment path that is not paved and is used by commercial, industrial, institutional, and/or governmental traffic.

- i. The owner and/or operator of any unpaved haul/access road (whether at a work site that is under construction or at a work site that is temporarily or permanently inactive) shall not allow visible fugitive dust emissions to exceed 20% opacity and shall not allow silt loading equal to or greater than 0.33 oz/ft^2 . However, if silt loading is equal to or greater than 0.33 oz/ft^2 , then the owner and/or operator shall not allow the silt content to exceed 6%.

- ii. The owner and/or operator of any unpaved haul/access road (including at a work site that is under construction or a work site that is temporarily or permanently inactive) shall, as an alternative to meeting the stabilization requirements for an unpaved haul/access road in Subsection [36.b.i] of this Condition, limit vehicle trips to no more than 20 per day per road and limit vehicle speeds to no more than 15 miles per hour. If complying with this subsection of this Permit, the owner and/or operator must include, in a Dust Control Plan, the maximum number of vehicle trips on the unpaved haul/access roads each day (including number of employee vehicles, earthmoving equipment, haul trucks, and water trucks) and a description of how vehicle speeds will be restricted to no more than 15 miles per hour.

[SIP Rule 310 §304.2]

- c. Disturbed Surface Area: The owner and/or operator of any disturbed surface area on which no activity is occurring (including at a work site that is under construction or a work site that is temporarily or permanently inactive) shall meet at least one of the standards described below, as applicable. Should such a disturbed surface area contain more than one type of stabilization characteristic, such as soil, vegetation, or other characteristic, which is visibly distinguishable, then the owner and/or operator shall test each representative surface separately for stability, in an area that represents a random portion of the overall disturbed conditions of the site, in accordance with the appropriate test methods described in Section 501.2(c) of Rule 310 and in Appendix C (Fugitive Dust Test Methods) of MCAQD rules. The owner and/or operator of such disturbed surface area on which no activity is occurring shall be considered in violation of Rule 310 if the area is not maintained in a manner that meets at least one of the standards listed below, as applicable. An area is considered to be a disturbed surface area until the activity that caused the disturbance has been completed and the disturbed surface area meets the standards described in this subsection.

- i. Maintain a soil crust;
- ii. Maintain a threshold friction velocity (TFV) for disturbed surface areas corrected for non-erodible elements of 100 cm/second or higher;
- iii. Maintain a flat vegetative cover (i.e., attached (rooted) vegetation or unattached vegetative debris lying on the surface with a predominant horizontal orientation that is not subject to movement by wind) that is equal to at least 50%;
- iv. Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant

vertical orientation) that is equal to or greater than 30%;

- v. Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant vertical orientation) that is equal to or greater than 10% and where the threshold friction velocity is equal to or greater than 43 cm/second when corrected for non-erodible elements;
- vi. Maintain a percent cover that is equal to or greater than 10% for non-erodible elements; or
- vii. Comply with a standard of an alternative test method, upon obtaining the written approval from the Control Officer and the Administrator.

[SIP Rule 310 §304.3]

37. Soil Moisture:

If water is the chosen control measure in an approved Dust Control Plan, the owner and/or operator of a dust-generating operation shall operate a water application system on-site (e.g., water truck, water hose) while conducting any earthmoving operations on disturbed surface areas 1 acre or larger, unless a soil crust is maintained or the soil is sufficiently damp to prevent loose grains of soil from becoming dislodged.

[SIP Rule 310 §307]

38. Dust Control Training Classes for Dust-Generating Operations:

- a. At least once every three years, the following people shall successfully complete a Basic Dust Control Training Class conducted or approved by the Control Officer.
 - i. Water truck drivers.
 - ii. Water-pull drivers.
 - iii. The site superintendent or other designated on-site representative of the permit holder.
- b. Any certification issued to a person having successfully completed a Basic Dust Control Training Class conducted or approved by the Control Officer may be suspended or revoked for cause, including, but not limited to, inappropriate ethical activities or conduct associated with the dust control program.

[SIP Rule 310 §309.1]

39. Dust Control Plan Revisions:

- a. If the Control Officer determines that an approved Dust Control Plan has been followed, yet fugitive dust emissions from any dust-generating operation still exceed the standards of this Permit, the Control Officer shall issue a written notice to the owner and/or operator of the dust-generating operation explaining such determination. The owner and/or operator of a dust-generating operation shall make written revisions to the Dust Control Plan and shall submit such revised Dust Control Plan to the Control Officer within three working days of receipt of the Control Officer's written notice, unless such time period is extended by the Control Officer, upon request, for good cause. During the time that such owner and/or operator is preparing revisions to the approved Dust Control Plan, such owner and/or operator must still comply with all requirements of this Permit.

[SIP Rule 310 §403.1]

- b. The Permittee shall request a Dust Control Plan revision with a submittal in the manner and form prescribed by the Control Officer if:
 - i. The acreage of a project changes;
 - ii. The permit holder changes;
 - iii. The name(s), address(es), or phone numbers of person(s) responsible for the submittal and implementation of the Dust Control Plan and responsible for the dust-generating operation change; and

- iv. If the activities related to the purposes for which the Dust Control Plan was obtained change.
[SIP Rule 310 §403.2]

40. Recordkeeping:

The Permittee shall maintain the following records for the time period specified in Condition 41 and make them available to the Control Officer upon request:

- a. The Permittee shall keep a written record of self-inspection on each day dust-generating operations are conducted. Self-inspection records shall include daily inspections for crusted or damp soil, trackout conditions and clean-up measures, daily water usage, and dust suppressant application. Such written record shall also include the following information:
- i. Method, frequency, and intensity of application or implementation of the control measures;
 - ii. Method, frequency, and amount of water application to the site;
 - iii. Street sweeping frequency;
 - iv. Types of surface treatments applied to and maintenance of trackout control devices, gravel pads, fences, wind barriers, and tarps;
 - v. Types and results of test methods conducted;
 - vi. If contingency control measures are implemented, actual application or implementation of contingency control measures and why contingency control measures were implemented;
 - vii. List of subcontractors' names and registration numbers updated when changes are made; and
 - viii. Names of employee(s) who successfully completed dust control training class(es), date of the class(es) that such employee(s) successfully completed, and name of the agency/representative who conducted such class(es).

[SIP Rule 310 §502.1]

- b. Upon verbal or written request by the Control Officer, the log or the records and supporting documentation shall be provided as soon as possible but no later than 48 hours after the request, excluding weekends. If the Control Officer is at the site where requested records are kept, records shall be provided without delay.

[SIP Rule 310 §§502.3]

41. Records Retention:

The Permittee shall retain copies of approved Dust Control Plans, control measures implementation records, and all supporting documentation for at least six months following the termination of the dust-generating operation and for at least two years from the date such records were initiated.

[SIP Rule 310 §503]

GENERAL CONDITIONS

42. Posting of Permit:

This Permit shall be posted in a clearly visible and accessible location on the site where the equipment is installed.

[Rule 200 §312][Locally Enforceable Only]

43. Compliance:

- a. The issuance of any Permit or Permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a Permit or Permit revision required under the County Rules.

[Rule 200 §309][Rule 220 §406.3][Locally Enforceable Only]

- b. The Permittee shall comply with all conditions of this Permit including all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations now in effect and as amended in the future. Any Permit noncompliance is grounds for enforcement action, Permit termination or revocation, or for denial of a renewal application. In addition, non-compliance

with any federally enforceable requirements constitutes a violation of the Clean Air Act.

[A.A.C. R18-2-306.A.8.a][Locally Enforceable Only]

- c. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with these Permit Conditions.

[Rule 220 §302.10][A.A.C. R18-2-306.A.8.b][Locally Enforceable Only]

- d. Rights and Privileges: This Permit does not convey any property rights or exclusive privilege of any sort.

[Rule 220 §302.12][Locally Enforceable Only]

- e. Fees: The Permittee shall pay all fees to the Control Officer in accordance with Rule 280. No permit or permit revision is valid until the applicable permit fee has been received and until the permit is issued by the Control Officer.

[Rule 200 §409][Rule 280 §302][A.R.S. 49-480(D)][SIP Rule 28]

44. Malfunctions, Emergency Upsets, and Excess Emissions:

An affirmative defense of an emergency, excess emission, and/or during startup and shutdown shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence as outlined in Rule 130 for emergencies and Rule 140 for excess emissions.

[Rule 130 §§201, 400][Rule 140 §§400, 500][SIP Rule 140]

45. Revision / Reopening / Revocation:

The Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[Rule 220 §302.11][Locally Enforceable Only]

46. Records:

- a. The Permittee shall furnish information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. The information shall be provided in a timeframe specified by the Control Officer. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator along with a claim of confidentiality.

[Rule 220 §302.13][SIP Rule 40]

- b. If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application is filed but prior to release of a proposed permit. Willful misrepresentation of facts in a permit application is cause for revocation or denial of a permit.

[Rule 220 §§301.5, 301.6][Locally Enforceable Only]

47. Right to Entry:

- a. The Control Officer during reasonable hours, for the purpose of enforcing and administering County or SIP Rules or the Clean Air Act, or any provision of the Arizona Revised Statutes relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under A.R.S. 49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.

- b. The Permittee shall allow the Control Officer or his designated representatives, upon presentation of proper credentials (e.g., Maricopa County Air Quality Department identification) and other documents as may be required by law, to:

- i. Enter upon the Permittee's premises where a source is located or emissions-related activity is

- conducted, or where records are required to be kept pursuant to the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that are required to be kept pursuant to the conditions of the permit;
 - iii. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;
 - iv. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the Permit or other applicable requirements; and
 - v. To record any inspection by use of written, electronic, magnetic, and photographic media.

[Rule 100 §105][Rule 220 §302.17-21][SIP Rule 43]

48. Severability:

The rules, paragraphs, clauses, provisions, and/or sections of this Permit are severable, and, if any rule, paragraph, clause, provision, and/or section of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

[Rule 220 §302.9][SIP Rule 80]

DRAFT

Equipment List

M.R. STEEL ACQUISITION CORPORATION

Permit Number 160035

Issue Date:

Equipment Description	Rated Capacity	Quantity Exist/Future
1. ENCLOSURE - 75' X 27' X 15' SPRAY ENCLOSURE W/ NO EXHAUST OR FILTER	.00	1 /
2. ENCLOSURE - 31' X 15.5' X 9.5' SPRAY ENCLOSURE W/ NO EXHAUST OR FILTER	.00	1 /
3. ABRASIVE BLASTING EQUIPMENT - DRY ABRASIVE BLASTING USING COPPER SLAG	.00	1 /
4. GRINDER - DEWALT BENCH GRINDER	.00	1 /
5. DUST COLLECTOR - SHOP VACUUM WITH CARTRIDGE FILTER FOR DEWALT GRINDER	.00	1 /
6. GRINDER - ALMI BELT GRINDER	.00	1 /
7. DUST COLLECTOR - SHOP VACUUM WITH CARTRIDGE FILTER FOR ALMI BELT GRINDER	.00	1 /
8. MACHINE - ACCUPRESS PRESS BRAKE	.00	1 /
9. SHEAR - ACCUSHEAR METAL SHEAR	.00	1 /
10. MACHINE - SCOTCHMAN IRONWORKER PUNCH	.00	1 /
11. MACHINE - EDWARDS 55 TON IRONWORKER PUNCH	.00	1 /