

Department of Environmental Quality
 Air Quality Program

**GENERAL
 AIR CONTAMINANT DISCHARGE PERMIT
 ASSESSMENT REPORT**

METAL FABRICATION AND FINISHING

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from large metal fabrication and finishing facilities subject to the Nine Metal Fabrication and Finishing NESHAP (40 CFR part 63 subpart XXXXXX). The Nine Metal Fabrication and Finishing NESHAP regulates facilities primarily engaged in the following operations that use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead.

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

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

2. This General Permit is designed to regulate large metal fabrication and finishing facilities. Specifically, those facilities that perform one or more of the following operations:
 - Dry abrasive blasting performed in a vented enclosure or of objects greater than 8 feet (2.4 meters) in any one dimension that uses materials that contain MFHAP or has the potential to emit MFHAP;
 - Spray-applied painting operation using MFHAP containing paints; or
 - Welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP and uses 2,000 pounds or more per year of MFHAP containing welding wire and rod (calculated on a rolling 12-month basis).

3. This General Permit does not apply to:
 - Research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).
 - Tool or equipment repair operations, facility maintenance, or quality control activities as defined in 40 CFR §63.11522.
 - Operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
 - Operations that produce military munitions, as defined in 40 CFR §63.11522, or equipment directly and exclusively used for the purposes of transporting military munitions.
4. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities defined by OAR Chapter 340 Division 200. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
5. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with OAR 340-216-0062, otherwise the facility must obtain a Simple or Standard Permit. A facility requesting to be assigned to a General Permit Attachment, in accordance with OAR 340-216-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

6. Facilities assigned to this General Permit are sources of volatile organic compound, particulate matter, and hazardous air pollutant emissions. These facilities may also be sources of carbon monoxide, nitrogen oxide and sulfur dioxides emissions.
7. DEQ has assessed the level of emissions from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources and compliant with applicable emissions limits. However, facilities assigned to this permit will be required to track and report abrasive material, welding rod and wire, and fuel usage. If DEQ determines that facilities assigned to this permit have the potential to emit at or above permitted emissions limits, the permittee will be required to obtain a different permit or the permit will be revised to ensure that these facilities emit at appropriate levels.

SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general visible emissions standards and nuisance requirements (control of fugitive dust and odors) in OAR Chapter 340, Division 208. The permit contains requirements and limitations to ensure compliance with these standards.
9. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 C.F.R. part 63 subpart XXXXXX, for Metal Fabrication and Finishing Facilities. EPA promulgated the NESHAP on April 3, 2008. The NESHAP is adopted as state rule in OAR 340-244-0220.
10. DEQ conducted a general activity-based risk screening for metal fabrication and finishing sources. Facilities that conduct welding activities using specified materials above thresholds are required to utilize a fume capture and control system before exceeding the applicable threshold.

COMPLIANCE ASSURANCE

11. Permittees are required to maintain records of notifications, changes at the facility, visual emission determinations, manufacturer's specifications for equipment, spray paint and booth production and maintenance, material usage, work practice activities, and complaints received at the facility related to air pollution concerns. These items are reported to DEQ annually, as applicable.
12. DEQ staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCACTION OF ASSIGNMENT

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

PUBLIC NOTICE

14. General Air Contaminant Discharge Permits are authorized by Oregon Administrative Rules and are part of the State Implementation Plan. As part of the General ACDP issuance process under OAR chapter 340 division 209, the public was provided at least 30 days to submit written comments. DEQ reviewed all comments received within the comment period and modified the permit in response to comments [see below].

DEFINITIONS

15. The terms not defined in the permit use the definition found in OAR 340-200-0020 or 40 C.F.R. part 63 subpart WWWW (§63.11511).

COMMENTS AND RESPONSES

Comment	Qualifications Condition 1.1 may be interpreted to say a material containing MFHAP must include cadmium, chromium, nickel, or lead <i>and</i> manganese.
Response	DEQ modified permit Condition 1.1b to clarify “ <i>If a material contains any of these MFHAP at the following levels, it is a material containing MFHAP: 0.1 percent by weight of cadmium, chromium, lead, or nickel; 1.0 percent by weight for manganese.</i> ”
Comment	The permit appears to exclude accounting for emissions when blast material does not contain MFHAP but the substrate <i>does</i> contain MFHAP.
Response	DEQ modified the permit to include recordkeeping and reporting provisions to address abrasive blasting on a substrate that contains or has the potential to emit MFHAP. This includes recordkeeping of hours of operations and MFHAP content of the substrate.

AQGP-025r, metal fabrication and finishing. 04/01/2011. 2/4/2021: DRD.