LRAPA
Lane Regional Air Protection Agency

ASSIGNMENT TO

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

Issued To:
Cascade Plating and Machine
3790 Cross Street
Eugene, OR 97402

Information Relied Upon:
Application Number: 67290
Dated: July 12, 2021

Plant Site Location:
3790 Cross Street
Eugene, OR 97402

Land Use Compatibility Statement:
From: City of Eugene
Dated: January 8, 1999

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA 37-0060(2), and based on the land use compatibility findings included in the permit record.

Steven A. Dietrich — 1-4-22

Steven A. Dietrich, Director — Dated

General ACDP Issued in Accordance with LRAPA Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-025	12/01/2031	Metal fabrication and finishing operations subject to 40 CFR part 63 subpart XXXXXX, as adopted under LRAPA titles 37 and 44.
Rule Citation	LRAPA 37-8010, Table 1, Part B, 78	
SIC	3499	
NAICS	332999	

SUPPLEMENTAL INFORMATION:

Facility Contact:		
Name:	Bruce Curry, Operations Manager	
Phone number:	(541) 689-4776	
Email address:	bruce@cp-m.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart XXXXXX (6X) and Subpart WWWWWW (6W)
Reports Required:		
Annual	Yes	February 15 each year
NSPS	No	N/A
NESHAP	Yes	February 15 each year
Other	N/A	N/A
Public Notice:	Category I	

MH 1/3/22: rr

LANE REGIONAL AIR PROTECTION AGENCY
GENERAL
AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060.

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich — 12-1-21

Steven A. Dietrich, Director — Dated

Metal Fabrication and Finishing Operations; Area sources primarily engaged in one of the following operations: (1) Electrical and Electronic Equipment Finishing Operations; (2) Fabricated Metal Products; (3) Fabricated Plate Work (Boiler Shops); (4) Fabricated Structural Metal Manufacturing; (5) Heating Equipment, except Electric; (6) Industrial Machinery and Equipment Finishing Operations; (7) Iron and Steel Forging; (8) Primary Metal Products Manufacturing; and (9) Valves and Pipe Fittings.

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 above, 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 (e.g., revenue generation where other common industry measurements are not applicable) 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 the General Provisions of 40 CFR 63.10(b)(3).

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1. Permit Assignment

Qualifications

1.1. The permittee must meet all of the following conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):

a. The permittee is primarily engaged in one or more of the metal fabrication activities listed on the cover page of this permit, including supporting activities;

b. The permittee uses materials that contain or have the potential to emit Metal Fabrication and Finishing Hazardous Air Pollutants (MFHAP). MFHAP are compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. 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**;

c. **The permittee performs one or more** of the following operations:

i. Dry abrasive blasting performed in a vented enclosure that uses materials that contain MFHAP or has the potential to emit MFHAP;

ii. Dry abrasive blasting 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;

iii. Spray-applied painting operation using MFHAP containing paints; or

iv. Welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP and uses 2,000 pounds or more of MFHAP containing welding wire and rod (calculated on a rolling 12-month basis).

d. The source does not qualify for a Basic ACDP and a Simple or Standard ACDP is not required for the source; and

e. The source is not having ongoing, recurring or serious compliance problems.

Excluded Activities and Operations

1.2. For facilities that meet the Qualifications criteria established in Condition 1.1, the following are not subject to this permit or the requirements of this permit:

a. Research or laboratory activities;

b. Tool or equipment repair operations;

c. Facility maintenance;

d. Quality control activities;

e. Operations performed on site at installations owned or operated by the Armed Forces of the United States, the National Aeronautics and Space Administration, or the National Nuclear Security Administration; or

f. Operations that produce military munitions manufactured by or for the Armed Forces of the United States, or equipment directly and exclusively used for the purposes of transporting military munitions.

Assignment

1.3. LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the qualifications in Condition 1.1, conditions of LRAPA 37-0060, or the Conditions of this permit.

Permitted Activities

1.4. Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

Relation to Local Land Use Laws

1.5. This permit is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws.

For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

2. General Emission Standards and Limits

Visible Emissions

2.1. The permittee must comply with the following visible emission limits:

a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than 3 minutes in any one hour; [LRAPA 32-010(3)]

b. Aggregate times consist of the total duration of all reading during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive; and [LRAPA 32-010(2)]

c. The visible emission standard in this Condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)]

Fugitive Emissions

2.2. The permittee must comply with the following:

a. The permittee must take reasonable precautions to prevent particulate matter, including fugitive dust, from becoming airborne from all site operations from which it may be generated. Such reasonable precautions include, but are not limited to: [LRAPA 48-015(1)]

i. Controlling vehicle speeds on unpaved roads;

ii. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne particulate;

iii. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;

iv. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;

v. The prompt removal from paved street of earth or other material that may become airborne;

vi. Alternative precautions approved by LRAPA.

b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period; [LRAPA 48-015(2)(a)]

c. Compliance with the fugitive emissions standard in this Condition is determined by EPA Method 22 at the downwind property boundary; and [LRAPA 48-015(2)(b)]

d. If requested by LRAPA, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period as determined by EPA Method 22. [LRAPA 48-015(3)]

Particulate Matter Fallout

2.3. The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

Nuisance and Odors

2.4. The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)]

Startup, Shutdown, and Malfunction Provisions

2.5. At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. [40 CFR 63.6(e)]

Malfunctions must be corrected as soon as practicable after their occurrence.

Particulate Emissions

2.6. The permittee must comply with applicable grain loading standards for particulate emission limits for non-fugitive emissions pursuant to LRAPA 32-015.

3. NESHAP 6X Applicability

40 C.F.R. Part 63 Subpart XXXXXX – Emission Standards for Nine Metal Fabrication and Finishing Source Categories

3.1. The permittee must comply with all applicable provisions of 40 C.F.R. 63.11514 – 63.11523 for all affected emissions to which this subpart applies by the applicable date in 40 C.F.R. 63.11515. The permittee must also comply with all applicable provisions of 40 C.F.R. Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standard, please refer to 40 C.F.R. Part 63, Subpart XXXXXX.

NESHAP Subpart XXXXXX is adopted and incorporated by reference in LRAPA title 44.

4. Operation and Maintenance Requirements

NESHAP Compliance Dates

4.1. The permittee must be in compliance with all applicable Conditions of this permit upon initial startup or assignment to this permit, whichever is later.

Dry Abrasive Blasting

4.2. The permittee must comply with the requirements in Conditions 4.3 through 4.5, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP or has the potential to emit MFHAP.

These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting. [40 CFR 63.11516(a)]

Dry Abrasive Blasting Performed in Totally Enclosed and Unvented Blast Chambers

4.3. For abrasive blasting chambers that are totally enclosed and unvented, the permittee must implement the following management practices to minimize emissions of MFHAP: [40 CFR 63.11516(a)(1)(i)-(ii)]

a. The permittee must **minimize dust generation during emptying** of abrasive blasting enclosures. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how dust generation is minimized onsite; and [40 CFR 63.11516(a)(1)(i)]

b. The permittee must **operate all equipment** associated with dry abrasive blasting operations **according to the manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's written instructions. [40 CFR 63.11516(a)(1)(ii)]

Dry Abrasive Blasting Performed in Vented Enclosures

4.4. For dry abrasive blasting operations, which have a vent allowing any air or blast material to escape, the permittee must comply with the following requirements. For dry abrasive blasting operations of items that exceed 8 feet (2.4 meters) in any dimension, the permittee may elect to comply with the requirements in Condition 4.5 in lieu of this Condition unless or until notified by LRAPA in writing that the permittee must comply with this Condition 4.4: [40 CFR 63.11516(a)(2)(i)-(ii)]

a. The permittee must **capture emissions and vent them to a filtration control device.** The permittee must operate the filtration control device according to manufacturer's instructions and must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's specifications and instructions. for the filtration control devices, as specified by the requirements in Condition 5.4. [40 CFR 63.11516(a)(2)(i)]

b. The permittee must minimize emissions of MFHAP by implementing the following management practices: [40 CFR 63.11516(a)(2)(ii)]

i. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable and **enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors** that transport abrasive materials. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how excess dust is reduced onsite and having the identified components enclosed; and [40 CFR 63.11516(a)(2)(ii)(A)&(B)]

ii. The permittee must **operate all equipment associated** with dry abrasive blasting operations **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, the manufacturer's written specifications and instructions. [40 CFR 63.11516(a)(2)(ii)(C)]

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

4.5. For dry abrasive blasting operations which are performed on objects greater than 8 feet in any one dimension, the permittee may comply with this Condition 4.5 instead of the practices required by Condition 4.4 unless or until notified by LRAPA in writing that the permittee must comply with Condition 4.4. [40 CFR 63.11516(a)(3)(i)-(iv)]

a. Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are as follows: [40 CFR 63.11516(a)(3)(i)]

i. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable; and [40 CFR 63.11516(a)(3)(i)(A)]

ii. The permittee must **enclose abrasive material storage areas** and holding bins, seal chutes and conveyors that transport abrasive material; and [40 CFR 63.11516(a)(3)(i)(B)]

iii. The permittee must **operate all equipment associated** with dry abrasive blasting operations **according to manufacturer's instructions**; and [40 CFR 63.11516(a)(3)(i)(C)]

iv. The permittee must **not re-use dry abrasive blasting media unless** contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and [40 CFR 63.11516(a)(3)(i)(D)]

v. Whenever practicable, the permittee must **switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media** (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP. The permittee must demonstrate compliance with this requirement by retaining documentation in the SOP or equivalent that describes the use of high particulate matter-emitting blast media and why it was (or would be) impracticable to use low PM-emitting blast media. [40 CFR 63.11516(a)(3)(i)(E)]

b. The permittee must demonstrate compliance with the requirements of Conditions 4.5.a.i, ii, iv, and v by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent). The permittee must demonstrate compliance with the requirements of Condition 4.5.a.iii by maintaining records of, and complying with, the manufacturer's written specifications and instructions.

c. The permittee must perform visual determinations of fugitive emissions, as specified in Condition 7.2, according to the following, as applicable. [40 CFR 63.11516(a)(3)(ii)]

i. For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the permittee must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation. [40 CFR 63.11516(a)(3)(ii)(A)]

ii. For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the permittee must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations. [40 CFR 63.11516(a)(3)(ii)(B)]

d. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Condition 8.0. [40 CFR 63.11516(a)(3)(iii)]

e. If visible fugitive emissions are detected, the permittee must perform corrective actions until the visible fugitive emissions are eliminated, at which time the permittee must comply with the following requirements. [40 CFR 63.11516(a)(3)(iv)]

i. The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 7.1. [40 CFR 63.11516(a)(3)(iv)(A)]

ii. The permittee must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by Condition 9.3c. [40 CFR 63.11516(a)(3)(iv)(B)]

Machining

4.6. 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. Other processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

The permittee must implement management practices to minimize emissions of MFHAP as follows for each machining operation that uses materials that contain MFHAP or has the potential to emit MFHAP: [40 CFR 63.11516(b)]

a. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes how excess dust is reduced onsite; and [40 CFR 63.11516(b)(1)]

b. The permittee must **operate all equipment associated** with machining **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [40 CFR 63.11516(b)(2)]

Dry Grinding and Dry Polishing with Machines

4.7. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not subject to this Condition.

The permittee must comply with the following requirements for each fixed and stationary dry grinding and dry polishing machine that does not use lubricating oils or fluids to minimize emissions of MFHAP: [40 CFR 63.11516(c)]

a. The permittee must **capture emissions and vent them to a filtration control device**. The permittee must demonstrate compliance with this requirement by maintaining a record of, and complying with, the manufacturer's specifications and instructions for the filtration control device(s); and [40 CFR 63.11516(c)(1)]

b. The permittee must implement management practices to minimize emissions of MFHAP as follows: [40 CFR 63.11516(c)(2)]

i. The permittee must **take measures necessary to minimize excess dust** in the surrounding area to reduce MFHAP emissions, as practicable. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard

Operating Procedures (or equivalent) that describes how excess dust is minimized onsite; and [40 CFR 63.11516(c)(2)(i)]

ii. The permittee must **operate all equipment** associated with the operation of dry grinding and dry polishing with machines **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [40 CFR 63.11516(c)(2)(ii)]

Spray Painting

4.8. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities. These requirements do not apply to affected sources that spray paint objects greater than 15 feet (4.57 meters) when those objects are not spray painted in spray booths or spray rooms.

The permittee must implement the following management practices when a spray-applied paint that contains MFHAP is being applied: [40 CFR 63.11516(d)(1)]

a. Spray painting. All spray-applied painting of objects must meet the following requirements.

i. Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables. [40 CFR 63.11516(d)(1)(i)]

ii. All spray booths and spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. If the permittee does not have filter efficiency data from the vendor, the permittee must follow the procedures for demonstrating filter efficiency as described in 40 C.F.R. 63.11516(d)(1)(ii). [40 CFR 63.11516(d)(1)(ii)]

iii. The permittee must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in Condition 8. [40 CFR 63.11516(d)(1)(iii)]

iv. As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of Conditions 4.8.a.i through 4.8.a.iii. [40 CFR 63.11516(d)(1)(iv)]

b. Spray painting application equipment of all objects painted. All paints applied via spray-applied painting must be applied with a high-volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation is allowed only after the permittee has obtained written approval from LRAPA or the EPA. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must follow the requirements in 40 C.F.R. 63.11516(d)(2). [40 CFR 63.11516(d)(2)]

c. Spray gun cleaning. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue

is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used. [40 CFR 63.11516(d)(4)]

d. Spray painting worker certification. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in Condition 4.8.e. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 4.8.e. The requirements of this condition do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of Condition 4.8.e. The requirements of this condition do not apply to operators of robotic or automated painting operations. [40 CFR 63.11516(d)(5)]

e. Spray painting training program content. The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by Condition 4.8.d. The training program must include, at a minimum, the following items: [40 CFR 63.11516(d)(6)]

i. A list of all current personnel by name and job description who are required to be trained; [40 CFR 63.11516(d)(6)(i)]

ii. Hands-on, or in-house, or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics: [40 CFR 63.11516(d)(6)(ii)]

- Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. [40 CFR 63.11516(d)(6)(ii)(A)]

- Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. [40 CFR 63.11516(d)(6)(ii)(B)]

- Routine spray booth and filter maintenance, including filter selection and installation. [40 CFR 63.11516(d)(6)(ii)(C)]

- Environmental compliance with the requirements of this permit. [40 CFR 63.11516(d)(6)(ii)(D)]

iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, if the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 4.8.e.ii, they are not required to provide the initial training required by that condition to these painters but must continue to comply with the recertification training. [40 CFR 63.11516(d)(6)(iii)]

f. Spray painting training dates. As required by Condition 4.8.e, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the following dates. [40 CFR 63.11516(d)(8)]

i. If the source is a new source, all personnel must be trained and certified no later than 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8.f.ii satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed. [40 CFR 63.11516(d)(8)(i)]

ii. If the source is an existing source, all personnel must be trained and certified no later than 180 days after hiring. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8.e.ii, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed. [40 CFR 63.11516(d)(8)(ii)]

g. Duration of training validity. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years. [40 CFR 63.11516(d)(9)]

Welding (All MFHAP welding)

4.9. The permittee must comply with the requirements in Conditions 4.9.a through 4.9.c for all welding operations that uses materials that contain MFHAP or has the potential to emit MFHAP. [40 CFR 63.11516(f)]

a. The permittee must **operate all equipment, capture devices, and control devices** associated with welding operations **according to manufacturer's instructions**. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written manufacturer's instructions. [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. The permittee must demonstrate compliance with this requirement by maintaining records of, and complying with, written Standard Operating Procedures (or equivalent) that describes which management practice(s) are implemented onsite. [40 CFR 63.11516(f)(2)]

i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG)); [40 CFR 63.11516(f)(2)(i)]

ii. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates; [40 CFR 63.11516(f)(2)(ii)]

iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation; [40 CFR 63.11516(f)(2)(iii)]

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; [40 CFR 63.11516(f)(2)(iv)]

v. Use a welding fume capture and control system according to the manufacturer's specifications and instructions. The permittee must maintain records of, and comply with, written manufacturer's instructions. [40 CFR 63.11516(f)(2)(v)]

c. The permittee must retain documentation of which management practices are employed on site and the date(s) of any changes to the work practices employed on site.

Welding (2,000 pounds or more of MFHAP wire and rod use per year)

4.10. If the permittee uses 2,000 pounds, or more, per year of welding wire and rod containing MFHAP (calculated on a rolling 12-month basis), the permittee must comply with the following: [40 CFR 63.11516(f)]

a. **Welding Activity Observations (Tier 1)**: The permittee must perform visual determinations of welding fugitive emissions as specified in Condition 7.2 (e.g., daily, weekly, monthly, and quarterly EPA Method 22 schedule) at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep records of all visual determinations in accordance with Condition 8.0. [40 CFR 63.11516(f)(3)]

i. **Detecting Visible Emissions From Welding**: If visible fugitive emissions are detected during any visual determination required by Condition 4.10.a, the permittee must perform, and keep record of, corrective actions that include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.9.b. After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 7.1 at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(4)&(4)(i)]

ii. The permittee must keep records of all visible emission detection instances, corrective actions taken, and results of follow-up observations for visible emissions. This information must be submitted with the annual report. [40 CFR 63.11516(f)(4)(ii)]

b. **Visible Emission Detection Twice in a 12-month Period (Tier 2)**: If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the permittee must conduct a visual determination of emissions opacity, as specified in Condition 7.3 (e.g., EPA Method 9) at the primary vent, stack, exit, or opening from the building containing the welding operations. This first opacity observation must be conducted within 24 hours of the end of the visual determination of fugitive emissions. The permittee must now also comply with the following: [40 CFR 63.11516(f)(5)&(5)(i)]

i. **Method 9 in lieu of Method 22 Now Required**: In lieu of the requirements of Condition 4.10.a to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with Condition 7.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(5)(ii)]

ii. The permittee must keep records of all visual determinations of emissions opacity in accordance with Condition 8.0, along with any subsequent corrective action taken. This information must be submitted with the annual report. [40 CFR 63.11516(f)(5)(iii)&(iv)]

iii. **Method 9 Opacity Results above 0% but less than or equal to 20%**: For each visual determination of emissions opacity performed in accordance with Condition 4.10.b that shows opacity of 20 percent or less but greater than zero, the permittee must perform, and keep records of, corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.9.b. [40 CFR 63.11516(f)(6)]

c. **If Tier 2 Reading Results above 20% (Tier 3)**: If any visual determination of emissions opacity performed in accordance with Condition 4.10.b shows opacity greater than 20 percent, the permittee must comply with the following requirements: [40 CFR 63.11516(f)(7)]

i. Develop or Revise Welding Management Plan: The permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Condition 4.10.d, within 30 days of the opacity exceedance. If the permittee already has a Site-Specific Welding Emissions Management Plan, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days. [40 CFR 63.11516(f)(7)(ii)]

ii. Daily Method 9 Readings: During the 30 day-period for preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must perform daily visual determinations of emissions opacity as specified in Condition 7.3 and 7.4 using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations. [40 CFR 63.11516(f)(7)(iii)]

iii. The permittee must keep all records of visual determinations of emissions opacity performed during the 30-day Site-Specific Welding Emissions Management Plan preparation period in accordance with Condition 8.0. This information must be submitted with the annual report. [40 CFR 63.11516(f)(7)(iv)]

iv. The permittee must report all exceedances of 20 percent opacity with the annual report, in accordance with Condition 9.3. [40 CFR 63.11516(f)(7)(i) &(v)]

d. **Site-Specific Welding Emissions Management Plan**. The Site-Specific Welding Emissions Management Plan must comply with the following requirements: [40 CFR 63.11516(f)(8)]

i. The Site-Specific Welding Emissions Management Plan must contain the following information: [40 CFR 63.11516(f)(8)(i)(A)-(F)]

- Company name and address;
- A list and description of all affected welding operations;
- A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
- A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
- A description of additional management practices and/or fume control methods to be implemented pursuant to Condition 4.9, and the projected date of implementation; and
- Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries.

ii. The following information within the Site-Specific Welding Emissions Management Plan must be updated annually and submitted with the annual report required by Condition 9.3. [40 CFR 63.11516(f)(8)(ii)]

iii. The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan onsite in a readily accessible location for review during an inspection, in accordance with the requirements in Condition 8.0. [40 CFR 63.11516(f)(8)(iii) and 40 CFR 63.11519(c)(13)]

5. Risk Mitigation Requirements

Welding Operations

5.1. Beginning January 1, 2022, the permittee must install and operate a fume capture and control system compliant with Condition 5.2 before: [LRAPA 37-0069(1) and OAR 340-245-0110]

a. **The permittee uses any** welding wire or rod electrode E310, E310-15, or 14Mn-4Cr;

b. **The permittee uses over 60 pounds** of any manganese-containing welding wire or rod in any 24-hour period;

c. **The permittee uses over 180 pounds** of any chromium VI (chrome 6) containing welding wire or rod in a 12 consecutive month period; or

d. **The permittee uses over 20,000 pounds of** any nickel-containing welding wire or rod in a 12 consecutive month period.

Operation

5.2. The permittee must operate and maintain the fume capture and control system according to the manufacturer's specifications and recommended procedures. Fume capture and control systems must be one of the following and route emissions to either a high efficiency filter, particulate scrubber, electrostatic precipitator, or activated carbon filter: [LRAPA 37-0069(1) and OAR 340-245-0110]

a. Torch fume extractor (portable collection and control units);

b. Permanent hoods, vents, and ducting; or

c. Enclosed welding booths.

Fume Capture and Control System Installation

5.3. Permittees required to install and operate a fume capture and control system must submit a Notice of Intent to Construct according to Condition 9.7 before commencing construction or installation of the pollution control equipment. [LRAPA 34-034]

6. Plant Site Emission Limits

Plant Site Emission Limits (PSELs)

6.1. Plant site emissions must not exceed the following. [LRAPA 42-0040 and 42-0060]

Pollutant	Limit	Units
PM	24	ton/year
PM10	14	
PM2.5	9	
VOC	39	
Single HAP	9	
Combined HAPs	24	

Annual Period

6.2. The annual plant site emissions limits apply to any 12-consecutive calendar month period.

7. Compliance Demonstration

Visual Determination of Fugitive Emissions, General

7.1. 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)]

Visual Determination of Fugitive Emissions, Graduated Schedule

7.2. Visual determinations of fugitive emissions must be performed in accordance with Condition 7.1 and according to the following schedule: [40 CFR 63.11517(b)]

a. **Daily Method 22 Testing**. Perform visual determination of fugitive emissions **once per day**, on each day the process is in operation, during operation of the process. If observations and records demonstrate that no visible emissions are detected in 10 consecutive daily Method 22 tests, the permittee may elect to comply with Condition 7.2.b in lieu of this 7.2.a. [40 CFR 63.11517(b)(1)]

b. **Weekly Method 22 Testing**. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with Condition 7.2.a for 10 days of work day operation of the process, the permittee may decrease the frequency of Method 22 testing to **once every five days (one calendar week)** of operation of the process. If visible fugitive emissions are detected during these tests, the permittee must resume Method 22 testing once per day during each day that the process is in operation, in accordance with Condition 7.2.a. If observations and records demonstrate that no visible fugitive emissions are detected in four consecutive weekly Method 22 tests, the permittee may elect to comply with Condition 7.2.c in lieu of this 7.2.b. [40 CFR 63.11517(b)(2)]

c. **Monthly Method 22 Testing**. If no visible fugitive emissions are detected in four consecutive weekly Method 22 tests performed in accordance with Condition 7.2.b, the permittee may decrease the frequency of Method 22 testing to **once per 21 days (one calendar month)** of operation of the process. If visible fugitive emissions are detected during these tests, the permittee must resume weekly Method 22 in accordance with Condition 7.2.b. If observations and records demonstrate that no visible fugitive emissions are detected in three consecutive monthly Method 22 tests, the permittee may elect to comply with Condition 7.2.d in lieu of this 7.2.c. [40 CFR 63.11517(b)(3)]

d. **Quarterly Method 22 Testing**. If no visible fugitive emissions are detected in three consecutive monthly Method 22 tests performed in accordance with Condition 7.2.c, the permittee may decrease the frequency of 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 Method 22 in accordance with Condition 7.2.c. [40 CFR 63.11517(b)(4)]

Visual Determination of Emissions Opacity for Welding Tier 2 or 3, General

7.3. Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A–4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test must be thirty minutes. [40 CFR 63.11517(c)]

Visual Determination of Emissions Opacity for Welding Tier 2 or 3, Graduated Schedule

7.4. The permittee must perform visual determination of emissions opacity in accordance with Condition 4.10.b and 4.10.c and according to the following schedule. [40 CFR 63.11517(d)]

a. **Daily Method 9 testing for welding, Tier 2 or 3**. Perform visual determination of emissions opacity once per day during each day that the process is in operation. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in 10 consecutive daily Method 9 tests, the permittee may elect to comply with Condition 7.4.b in lieu of this 7.4.a. [40 CFR 63.11517(d)(1)]

b. **Weekly Method 9 testing for welding, Tier 2 or 3**. If the average of the six minute opacities recorded during any of the daily consecutive Method 9 tests performed in accordance with Condition 7.4.a does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee must resume testing every day of operation of the process according to the requirements of Condition 7.4.a. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in four consecutive weekly Method 9 tests, the permittee may elect to comply with Condition 7.4.c in lieu of this 7.4.b. [40 CFR 63.11517(d)(2)]

c. **Monthly Method 9 testing for welding Tier 2 or 3**. If the average of the six minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with Condition 7.4.b does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of 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 according to the requirements of Condition 7.4.b. If observations and records demonstrate that no exceedances of 20 percent opacity are detected in three consecutive monthly Method 9 tests, the permittee may elect to comply with Condition 7.4.d in lieu of this 7.4.c. [40 CFR 63.11517(d)(3)]

d. **Quarterly Method 9 testing for welding Tier 2 or 3**. If the average of the six minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with Condition 7.4.c does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of Method 9 testing to once per every 3 months of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process according to the requirements of Condition 7.4.c. [40 CFR 63.11517(d)(4)]

e. **Return to Method 22 testing for welding, Tier 2 or 3**. If, after two years of quarterly testing (eight observations) according to Condition 7.4.d, the results of all Method 9 tests show no exceedances of 20 percent opacity, the permittee may resume Method 22 testing according to Conditions 7.1 and 7.2.a (daily). In lieu of this, the permittee may elect to continue performing Method 9 tests in accordance with Condition 7.4. [40 CFR 63.11517(d)(5)]

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

7.5. Compliance with the VOC and HAP PSELs is determined for each 12-consecutive calendar month period based on material throughput. [LRAPA 42-0080]

a. Facilities will be presumed to be in compliance with the yearly VOC and HAP PSELs provided total VOC and HAP containing coating and solvent consumption does not exceed 2,500 gallons during any 12-consecutive calendar month period.

b. If the permittee exceeds the total VOC and HAP containing coating and solvent consumption stated above, the permittee must demonstrate compliance with the yearly VOC and HAP PSELs on a monthly basis as follows:

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

where,
$E_{VOC\ or\ HAP}$ = VOC or HAP emissions (tons/yr);
$\sum$ = Symbol representing "summation of";
C = Material usage for the period in gallons (gals);
K = VOC or HAP content of the material (pounds/gal);
X = Subscript X represents a specific material.

Other Materials Compliance Monitoring

7.6. Compliance with the PM and HAP PSELs for blasting, machining, grinding, polishing, and welding is determined for each 12-consecutive calendar month period based on material throughput or calculated with emission factors in Condition 14 and 15. [LRAPA 42-0080]

a. The permittee must demonstrate compliance with the yearly HAP PSELs on a monthly basis as follows:

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

where,
E_{HAP} = HAP emissions (tons/yr);
$\sum$ = Symbol representing "summation of";
C = Material usage for the period in pounds (lbs);
K = HAP content of the material (lbs/gal);
X = Subscript X represents a specific material.

b. The permittee must demonstrate compliance with the yearly PM PSELs on a monthly (or daily) basis, as applicable, as follows:

$$E_{PM/PM10/PM2.5} = [\sum (C * K)] \times 1\ ton/2000\ pounds$$

where,
$E_{PM/PM10/PM2.5}$ = PM emissions (tons/yr);
$\sum$ = Symbol representing "summation of";
C = Material usage for the period in 1,000 pounds (lbs);
K = Emission factor from Condition 14 or 15;

8. Recordkeeping Requirements

General Compliance and Applicability Records

8.1. The permittee must keep the following records for each affected source. [LRAPA 34-016 and 40 CFR 63.11519(c)]

a. **Notifications**: Each notification and report that is submitted to comply with this permit, and the documentation supporting each notification and report. [40 CFR 63.11519(c)(1)(i)]

b. **Determinations**: All applicability determinations listing equipment included in the affected source, as well as any changes and on what date the changes occurred, must be maintained. [40 CFR 63.11519(c)(1)(ii)]

c. **Manufacturer Documentation**: All manufacturer's specifications, instructions, and recommended maintenance procedures for all control devices and equipment required by Conditions 4.2 through 4.9, as applicable. For all instances in which manufacturer documentation is not available, the permittee must develop, maintain, and comply with site-specific Standard Operating Procedures that are based upon available manufacturer documentation for similar equipment, to the extent possible. [40 CFR 63.11519(c)(4)]

d. **Material Usage**: The permittee must maintain records of yearly emissions and monthly material usage, as applicable under Condition 7.5 and 7.6 and as follows:

i. Spray Coatings and Solvents: The permittee must maintain records of each coating and solvent used on a monthly basis and the VOC and HAP content of each.

ii. Fuels: The permittee must maintain records of fuel usage on a monthly basis for each fuel type used and identify how each fuel was used (e.g., engine, boiler, heater, etc.).

iii. Abrasive Blast Materials: The permittee must maintain records of abrasive material usage in pounds on a monthly basis for each type of abrasive used. Records must also include whether Condition 4.3, 4.4, or 4.5 were complied with for each material (e.g., X pounds of Y blast material was used complying with Condition 4.3).

iv. Abrasive Blasting Substrate: The permittee must maintain monthly records of the hours of operation during which abrasive blasting was performed on each substrate that contains differing MFHAP or amounts of MFHAP (i.e., total hours for various substrates may be added together if the MFHAP contents of the substrates are identical). The permittee must also retain the MFHAP content of each substrate blasted.

v. Welding Wire and Rod: The permittee must maintain records of welding wire and rod usage in pounds on a monthly basis for each welding wire or rod used. The permittee must maintain records of the welding type or process that each wire or rod is used in. If the permittee uses manganese-containing welding wire or rod, the same usage data for this wire and rod must be retained on a daily basis. [40 CFR 63.11519(c)(14)]

e. **Standard Operating Procedures**: The permittee must maintain a copy of Standard Operating Procedures (or equivalent) that addresses each emissions unit or activity as applicable.

Visual Determination of Fugitive and Opacity Emissions

8.2. Maintain a record of the following information for each visual determination of fugitive and opacity emissions in accordance with Condition 7.1 through 7.4: [40 CFR 63.11519(c)(2)-(3)(iii)]

a. The date and results of every visual determination. For opacity determinations this must include the average of the six-minute opacity as measured by the observation;

b. A description of any corrective actions taken after the observations and the date corrective actions were completed; and

c. The date and results of any follow-up visual determination performed after the corrective actions were taken.

Spray Painting Activities

8.3. Maintain the following records associated with spray-applied coating activities: [40 CFR 63.11519(c)(5)]

a. **Booth Filter records** must include:

i. Documentation of the filter efficiency determinations or vendor filter efficiency documentation.

ii. The filter manufacturer's or vendor's written instructions for operation and maintenance or replacement.

iii. Spray paint booth and filter-related maintenance activities, including the dates filter maintenance or replacements are conducted.

b. **Waterspray or Water Curtain records** must include documentation of compliance with the 98% control requirement. The permittee must also retain manufacturer's written operation and maintenance instructions and records of operations and maintenance in accordance with the manufacturer's documentation. [40 CFR 63.11519(c)(6)]

c. **HVLP (or other) Documentation and Cleaning records** must include: [40 CFR 63.11519(c)(7)]

i. Documentation of HVLP, or other high transfer efficiency spray paint delivery systems, according to Condition 4.8. This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. [40 CFR 63.11516(d)(3) and 40 CFR 63.11519(c)(7)]

ii. If the permittee has obtained written approval for an alternative spray application system in accordance with Condition 4.8.b, the permittee must comply with and maintain a record of that approval. The permittee must retain documentation of the demonstration of equivalency for as long as the alternate application method is used on site. [40 CFR 63.11519(c)(7)]

iii. An SOP that describes how spray gun cleaning is performed on site in compliance with Condition 4.8.c.

d. **Employee Training records** must include documentation of the certification for each worker that demonstrates compliance with the training requirements of Condition 4.8.e, including the date the initial training and the most recent refresher training were completed. [40 CFR 63.11516(d)(7) and 40 CFR 63.11519(c)(8)]

Welding Activities

8.4. The permittee must maintain the following records associated with welding activities:

a. **Site-Specific Welding Management Plan records** must include a record of the most recent site-specific welding emissions management plan and all past versions of the plan, as applicable. [40 CFR 63.11519(c)(12)]

b. **Visual Determinations During Plan Development**: The permittee must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with Condition 4.10.c, as applicable. [40 CFR 63.11519(c)(11)]

c. If the permittee is required to install and operate a fume capture and control system in accordance with Condition 5.0, the permittee must retain manufacturer documentation describing operation and maintenance procedures. The permittee must retain documentation demonstrating that these operation and maintenance procedures are followed.

Excess Emissions

8.5. The permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.

Retention of Records

8.6. Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to LRAPA upon request. The permittee must maintain at least the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review. [40 CFR 63.11178(a) and LRAPA 34-016(5) and 40 CFR 63.11519(c)(15)]

Complaint Log

8.7. The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee must investigate the condition within 24 hours, if possible. [LRAPA 34-016(1)]

The log must include at least the following for each complaint or concern received:

a. The date the complaint was received;

b. The date and time the complainant states the condition was present;

c. A description of the complaint;

d. The location of the complainant or receptor relative to the plant site;

e. The status of plant operations and activities during the complainant's stated time of pollution or odor condition;

f. A description of the permittee's actions to investigate the validity of the complaint; and

g. A description of any actions taken in response to the complaint investigation.

9. Reporting Requirements

Initial Notification

9.1. The permittee must submit an Initial Notification in accordance with 40 CFR 63.11519(a)(1) within 120 days after initial startup. A form for this purpose is available from LRAPA. The notification must be submitted to LRAPA **and** EPA's Region X Office. [40 CFR 63.11519(a)(1)]

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Notification of Compliance Status

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

a. For existing sources, this notification must be submitted on or before November 22, 2011;

b. For new sources, this notification must be submitted within 120 days after initial startup.

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Annual Report

9.3. The permittee must prepare and submit one (1) copy of an annual report for the previous calendar year according to the following requirements: [LRAPA 34-016(1)&(2) and 40 CFR 63.11519(b)(1)-(9)]

a. Dates. The permittee must prepare and submit the annual report no later than January 31 of each year. [40 CFR 63.11519(b)(2)]

b. General requirements. The annual report must contain the following information. [40 CFR 63.11519(b)(4)(i)-(iii)]

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.

c. Visual determination of fugitive and opacity requirements. The annual report must contain the following information for each affected source that performs visual determination of fugitive emissions or opacity emissions in accordance with Condition 7.2 or 7.4. [40 CFR 63.11519(b)(5)&(6)]

i. The date of every visual determination of fugitive emissions that resulted in detection of visible emissions;

ii. The date of every visual determination of emissions opacity and the average of each six-minute opacity determined by the observation;

iii. A description of all corrective actions taken subsequent to a visual observation;

iv. The date and results of all follow-up visual determinations performed after the corrective actions; and

v. As required by Condition 4.10.c.iv, the permittee must include an exceedance report for each instance in which the average opacity during a visual determination exceeded 20 percent. The report must include the date on which the exceedance(s) occurred and what the average opacity was during the visual determination. [40 CFR 63.11519(b)(8)]

d. Welding wire and rod usage. The total welding rod usage, in pounds, for the previous calendar year. This must include an identification of the specific wire or rod electrode and the specific welding process type in which the material was used. The permittee must state whether any of the thresholds in Condition 5.0 were exceeded. [40 CFR 63.11519(c)(14)]

e. Fuel usage. The amount of each fuel used, in applicable units, in the previous calendar year. This must include how the fuel was used (e.g., in a backup generator, boiler, heater, etc.).

f. Abrasive Blasting. The total amount of abrasive material usage, in pounds, for the previous calendar year. This must include whether each type of blast material was used in a totally enclosed chamber, vented enclosure, or, for objects larger than 8 feet in any one dimension, a certification that the permittee complied with Condition 4.4 or 4.5.

    i. The permittee must include the total hours of operation during which abrasive blasting was performed on each substrate that contains MFHAP for each substrate with different MFHAP or amounts of MFHAP, according to Condition 8.1.d.iv. The permittee must include the MFHAP content of each substrate blasted.

g. Site-specific Welding Emissions Management Plan reporting. The permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 4.10.c.ii. The permittee must submit a copy of the updated Site-Specific Welding Emissions Management Plan as required by Condition 4.10.d.ii. [40 CFR 63.11519(b)(9)]

h. Emissions or coating and solvent usage. Annual VOC and HAP containing coating and solvent usage or annual emissions, as applicable (see Condition 7.5 or 7.6).

Excess Emissions

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

a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 10.3.

b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

c. The permittee must also submit follow-up reports when required by LRAPA.

Initial Startup Notice

9.5. The permittee must notify LRAPA in writing of the date a newly permitted source is first brought into normal operation. The notification must be submitted no later than seven (7) days after the initial startup.

Notice of Change of Ownership or Company Name

9.6. The permittee must notify LRAPA in writing using an LRAPA "Permit Application Form" within 60 days after any of the following: [LRAPA 37-0030(4)]

a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or

b. Sale or exchange of the activity or facility.

Construction or Modification Notices

9.7. The permittee must notify LRAPA in writing using an LRAPA "Notice of Construction Form," or other permit application form, and obtain approval in accordance with LRAPA title 34 before:

a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions; [LRAPA 34-034(1)]

b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or [LRAPA 34-034(2)]

c. Constructing or modifying any air pollution control equipment. [LRAPA 34-034(3)]

Where to Send Reports and Notices

9.8. Reports and notices, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 10.2 unless otherwise specified.

10. Administrative Requirements

Reassignment to the General ACDP

10.1. A permittee that wishes to continue assignment to this General ACDP must submit to LRAPA an application for reassignment as follows:

a. The application must be received by LRAPA within 30 days prior to the expiration date listed on this permit; [LRAPA 37-0040(2)(c)]

b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application. [LRAPA 37-0082(1)(b)]

LRAPA Address

10.2. All reports, notices, applications, and fees must be directed to LRAPA as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
541-736-1056

LRAPA Website

10.3. Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

11. Fees

Annual Compliance Fee

11.1. The annual fees specified in LRAPA 37-8020, Table 2 for a General ACDP are due on or by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to this date.

Change of Ownership or Company Name Fee

11.2. The Non-Technical Permit Modification specific activity fee specified in LRAPA Section 37-8020, Table 2, Part 4.a. is due with an application for changing the ownership or the name of the company for a source assigned to this permit. Forms that require fees must be sent together to the LRAPA address as identified in Condition 10.2.

Where to Submit Fees

11.3. Fees, with a permit number prominently displayed, must be sent to the LRAPA address as identified in Condition 10.2:

12. General Conditions and Disclaimers

Other Regulations

12.1. In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by LRAPA. [ORS 468A.060 and LRAPA 12-001(2)]

Conflicting Conditions

12.2. In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

Masking of Emissions

12.3. The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050]

LRAPA Access

12.4. The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with LRAPA Section 13-020. [ORS 468.095(1) and LRAPA 13-020(1)(h)]

Permit Availability

12.5. The permittee must have a copy of the permit available at the facility at all times. [LRAPA 37-0020(3)]

Outdoor Burning

12.6. The permittee must not conduct any outdoor burning except as allowed by LRAPA title 47. [LRAPA 47-015(4)&(5)]

Asbestos

12.7. The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.

Property Rights

12.8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Termination, Revocation, Rescission, or Modification

12.9. LRAPA may modify or revoke this permit pursuant to LRAPA Sections 37-0082 and 37-0084.

13. Abbreviations, Acronyms, and Definitions

ACDP	Air Contaminant Discharge Permit
AQGP	Air Quality General Permit
AQMA	Air Quality Maintenance Area
calendar year	The 12-month period beginning January 1st and ending December 31st
CAO	Cleaner Air Oregon
Cd	cadmium
CFR	Code of Federal Regulations
CO	carbon monoxide
Cr	chromium
DEQ	Oregon Department of Environmental Quality
EPA	US Environmental Protection Agency
FCAW	Flux cored arc welding
ft^3	cubic feet
Gal	gallon(s)
GMAW	Gas metal arc welding
HAP	Hazardous Air Pollutant as defined by LRAPA title 44
HVLP	High Volume Low Pressure
lb	pound(s)
LRAPA	Lane Regional Air Protection Agency

Mn	Manganese
MSDS	Material safety data sheet
NESHAP	National Emissions Standards for Hazardous Air Pollutants
Ni	Nickel
NO_X	nitrogen oxides
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
Pb	lead
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
PSEL	Plant Site Emission Limit
SAW	Submerged arc welding
SCC	Source Classification Code
SDS	Safety data sheet
SIC	Standard Industrial Code
SMAW	Shielded metal arc welding
SO_2	sulfur dioxide
VOC	volatile organic compound
year	A period consisting of any 12-consecutive calendar months

14. PM Emission Factors for Welding

All emission factors are applicable to PM, PM10, and PM2.5. For permittees that use fume capture and control device(s), manufacturer documentation regarding capture and control efficiency may be cited to report a lower emission factor as applicable.

Welding Process	Electrode Type(s)	Last two digits of SCC	Emission Factor	Emission Factor Units
SMAW (SCC 3-09-051)	14Mn-4Cr	(-04)	81.6	lbs/1,000 lbs of electrode consumed
	E11018, E11018-M	(-08)	16.4	
	E308, E308-16, E308L-15	(-12)	10.8	
	E310, E310-16	(-16)	15.1	
	E316, E316-15, E316-16, E316L-16	(-20)	10.0	
	E410, E410-16	(-24)	13.2	
	E6010	(-28)	25.6	
	E6011	(-32)	38.4	
	E6012	(-36)	8.0	
	E6013	(-40)	19.7	
	E7018	(-44)	18.4	
	E7024	(-48)	9.2	
	E7028	(-52)	18.0	
	E8018, E8018C3	(-56)	17.1	
	E9015, E9015B3	(-60)	17.0	
	E9018, E9018B3, E9018G	(-64)	16.9	
	ECOCr, ECoCr-A	(-68)	27.9	
	Eni-Cl	(-72)	18.2	
	ENiCrMo, ENiCrMo-4	(-76)	11.7	
	Eni-Cu, Eni-Cu-2	(-80)	10.1	
GMAW (SCC-3-09-052)	E308L	(-12)	5.4	lbs/1,000 lbs of electrode consumed
	E70S	(-54)	5.2	
	ER1260	(-10)	20.5	
	ER5154	(-26)	24.1	
	ER316	(-20)	3.2	
	ERNiCrMo	(-76)	3.9	
	ERNiCu	(-80)	2.0	
FCAW (SCC 3-09-053)	E110, E110TS-K3	(-06	20.8	lbs/1,000 lbs of electrode consumed
	E11018	(-08)	57.0	
	E308LT, E308LT-3	(-12)	9.1	
	E316LT, E316LT-3	(-20)	8.5	
	E70T, E70T-1, E70T-2, E70T-4, E70T-5, E70T-7, E70T-G	(-54)	15.1	
	E71T, E71T-1, E71T-11	(-55)	12.2	
SAW (SCC 3-09-054)	EM12K, EM12K1, F72-EM12K2	(-10)	0.05	lbs/1,000 lbs of electrode consumed

15. PM Emission Factors for Abrasive Blasting

Activity	Pollutant	Emission Factor	Emission Factor Units
Sand Blasting	PM	57.6[1]	lbs/1,000 pounds of abrasive used
	PM_{10}	13	
	$PM_{2.5}$	1.3	
Grit Blasting[2]	PM	13.8	lbs/1,000 pounds of abrasive used
	PM_{10}	3.1	
	$PM_{2.5}$	0.3	
Shot Blasting[2]	PM	5.76	lbs/1,000 pounds of abrasive used
	PM_{10}	1.3	
	$PM_{2.5}$	0.13	
Abrasive Blasting w/ Fabric Filter Control	$PM/PM_{10}/PM_{2.5}$	0.69	lbs/1,000 pounds of abrasive used

1: Total PM emissions are variable based on windspeed, between 27 and 91 lb/1,000 lbs of abrasive, 57.6 is the mean of available emission factor data that accounts for varying windspeed throughout the year at the source.
2: AP-42 estimates that Grit Blasting emits 24% and Shot Blasting emits 10% of total Sand Blasting PM.

cnc 10/19/21 :rr
AQGP-025 metal fabrication and finishing

LRAPA
Lane Regional Air Protection Agency

Lane Regional Air Protection Agency

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

METAL FABRICATION AND FINISHING

Cascade Plating and Machine
Source/Permit No. 201266
3790 Cross Street
Eugene, OR 97402
http://cp-m.com/

SOURCE DESCRIPTION AND QUALIFICATION

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

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

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

2. Cascade Plating and Machine is assigned to this General Permit because SIC 3499/NAICS 332999 for "Fabricated Metal Products, NEC" is listed as the affected source category for the Nine Metal Fabrication and Finishing NESHAP on their 2012 Initial Notification.

3. Cascade Plating and Machine is also assigned to the General ACDP Attachment for Plating and Polishing operations for dry mechanical polishing activities.

4. 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.

5. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities as defined under LRAPA title 12. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.

6. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.

7. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

8. Facilities assigned to this General Permit are sources of particulate matter (PM) and hazardous air pollutant (HAP) emissions. These facilities may also be sources of volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxides (NOx) and sulfur dioxides (SO2) emissions.

9. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources of federal hazardous air pollutants and compliant with applicable emission limits.

10. LRAPA has assessed the level of emissions from these facilities and determined that facilities assigned to this permit do not have the potential to emit at or above the established Significant Emission Rates (SERs) stated in Table 2 of LRAPA title 12 for carbon monoxide, nitrogen oxides, particulate matter, PM10 and sulfur oxides. However, facilities assigned to this permit will be required to track and report abrasive material, welding rod and wire, fuel usage, and the amount of metal processed. If LRAPA determines that facilities assigned to this permit have the potential to emit at or above the established levels of concern, the permit will be revised to ensure that these facilities emit at or below the levels of concern.

FACILITY EMISSION UNITS

11. The facility has the following equipment and/or activities regulated by the permit:

Emission Unit (EU)	Description/Pollution Controls
Four (4) hard chromium electroplating tanks – REMOVED IN 2021	Controlled by three (3) composite mesh pad (CMP) mist eliminator systems – REMOVED IN 2021
Dry mechanical polishing	Controlled by cartridge filters
Metal fabrication: One (1) stick welder, three (3) TIG welders, four (4) MIG welders, one (1) plasma cutter, four (4) sets of oxy-acetylene torches, and misc. hand and die grinders	Operation and management practices

SOURCE TEST RESULTS

12. The facility has the following test results:

Test Date(s)	EU/Tank(s)	Result(s)	Pressure Drop
November 4-6, 1997	Four (4) Existing Tanks	• Tanks 1&2: 0.0031 mg/dscm; • Tank 3: 0.0066 mg/dscm; • Tank 4: 0.0016 mg/dscm	3.5 inches of water column for control systems 1 and 2; 3.6 inches of water column for control system 3
September 25-26, 2018	Two (2) Existing Tanks	• System 1 ("small") Tank: 0.002 mg/dscm • System 2 ("large") Tank: 0.002 mg/dscm	<1.5 inches of water column for control system 1; <2.1 inches of water column for control system 2

The chromium plating tanks were removed in 2021 along with their control systems.

SPECIFIC AIR PROGRAM APPLICABILITY

13. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA titles 32, 48, and 49. The permit contains requirements and limitations to ensure compliance with these standards.

14. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 CFR part 63 subpart XXXXXX, for Metal Fabrication and Finishing Facilities. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on April 3, 2008. The NESHAP is adopted in LRAPA title 44.

15. The Nine Metal Fabrication and Finishing NESHAP contains options for graduated schedules of visual determination of fugitive emissions (Condition 7.2) and visual determination of opacity for welding emissions (Condition 7.4). The language of the NESHAP appears to assume a five (5) day work week and is not clear how the graduated schedule works for a six (6) or seven (7) day work week. EPA clarified in their 2020 Question and Answer document that testing frequency in the rule can be either, once every five days or one calendar week of operation (Condition 7.2.b and Condition 7.4.b). This interpretation carries forward to the monthly, (once every 21 days or one month of operation) (Condition 7.2.c and Condition 7.4.c), and quarterly testing, (once per 60 days or 3 months of operation) (Condition 7.2.d and Condition 7.4.d), as well. For additional clarification, see Questions 83 and 84 in the EPA Q&A document here: https://www.epa.gov/sites/default/files/2020-06/documents/qa-6x-9metal-fabricationfinishing-areaneshap-06-22-20.pdf

16. Oregon DEQ conducted a general activity-based risk screening for metal fabrication and finishing sources assigned to their General Permit for facilities subject to the Nine Metal Fabrication and Finishing NESHAP. Facilities that conduct welding activities using the specified materials above thresholds are required to utilize a fume capture and control system before exceeding the applicable threshold.

COMPLIANCE ASSURANCE

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

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

REVOCATION OF ASSIGNMENT

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

PUBLIC NOTICE

20. General Air Contaminant Discharge Permits are authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public was provided at least 30 days to submit written comments. There were no comments received during the public comment period.

DEFINITIONS

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

AQGP-025r, 6X Metal Fabrication and Finishing ACDP RevRept
cnc 10/19/21:rr
mkh 01/03/22: rr

LRAPA
Lane Regional Air Protection Agency

ASSIGNMENT TO

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

Issued To:
Cascade Plating and Machine
3790 Cross Street
Eugene, OR 97402

Information Relied Upon:
Application Number: 67290
Dated: July 12, 2021

Plant Site Location:
3790 Cross Street
Eugene, OR 97402

Land Use Compatibility Statement:
From: City of Eugene
Dated: January 8, 1999

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA 37-0060(2), and based on the land use compatibility findings included in the permit record.

Steven A. Dietrich — 1-4-22

Steven A. Dietrich, Director — Dated

General ACDP Issued in Accordance with LRAPA Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-026a	12/01/2031	Plating and polishing operations subject to 40 CFR part 63 subpart WWWWWW, as adopted under LRAPA titles 37 and 44.
Rule Citation	LRAPA 37-8010, Table 1, Part B, 82	
SIC	3471	
NAICS	332813	

SUPPLEMENTAL INFORMATION:

Facility Contact:		
Name:	Bruce Curry, Operations Manager	
Phone number:	(541) 689-4776	
Email address:	bruce@cp-m.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart WWWWWW (6W) and Subpart XXXXXX (6X)
Reports Required:		
Annual	Yes	February 15 each year
NSPS	No	N/A
NESHAP	Yes	February 15 each year
Other	N/A	N/A
Public Notice:	Category I	

MH 1/3/22: rr

LANE REGIONAL AIR PROTECTION AGENCY

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

ATTACHMENT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit attachment is being issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060.

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich, Director — Dated 12-1-21

Plating and polishing operations including electroplating (other than chromium electroplating), electroless or non-electrolytic plating, non-electrolytic metal coating processes (e.g. chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, manganese phosphate coating), thermal spraying, dry mechanical polishing of finished metals and formed products after plating or thermal spraying, electroforming, and electropolishing, subject to 40 C.F.R. part 63 subpart WWWWWW, as adopted under LRAPA title 44.

TABLE OF CONTENTS

1.0 PERMIT ASSIGNMENT

1.1. Qualifications

The permittee must meet all of the following Conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP) attachment:

a. The permittee is performing plating and polishing activities listed on the cover page of this permit attachment, including supporting activities;
b. The plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal hazardous air pollutants (HAP), which means any compound of the following metals: cadmium, chromium, lead, manganese, and nickel. With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form;
c. The source does not qualify for a Basic ACDP and a Simple or Standard ACDP is not required for the source; and
d. The source is not having ongoing, recurring or serious compliance problems.

1.2. Exclusions

This permit attachment does not apply to any of the following process units or operations:

a. Process units that are subject to the requirements of 40 C.F.R. part 63 subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks);
b. Research and development process units;
c. Process units that are used strictly for educational purposes;
d. Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment;
e. Dry mechanical polishing conducted to restore the original finish to a surface; or
f. Any plating or polishing process that does not use any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, and that does not use any material that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Safety Data Sheet for the material.

1.3. Assignment

LRAPA will assign qualifying permittees to this permit attachment that have and maintain a good record of compliance with the LRAPA's Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment of the permittee no longer meets the qualifications in Condition 1.1 above, conditions of LRAPA Section 37-0060, or the Conditions of this permit attachment.

1.4. Permitted Activities

Until this permit attachment expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit attachment in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit attachment.

1.5. Relation to Local Land Use Laws

This permit attachment is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. The permittee must obtain local land use approvals as, or where, applicable before operating this facility at any location.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must comply with the following visible emission limits:

a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than 3 minutes in any one hour; [LRAPA 32-010(3)]
b. Aggregate times consist of the total duration of all reading during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive; and [LRAPA 32-010(2)]
c. The visible emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)]

2.2. Fugitive Emissions

The permittee must comply with the following:

a. The permittee must take reasonable precautions to prevent particulate matter, including fugitive dust, from becoming airborne from all site operations from which it may be generated; [LRAPA 48-015(1)]
b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period; [LRAPA 48-015(2)(a)]
c. Compliance with the fugitive emissions standard in Condition 2.2.b is determined by EPA Method 22 at the downwind property boundary; and [LRAPA 48-015(2)(b)]
d. If requested by LRAPA, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period following the procedures of EPA Method 22. [LRAPA 48-015(3)]

2.3. Particulate Matter Fallout

The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [LRAPA 32-050]

2.4. Nuisance and Odors

The permittee must comply with the following nuisance and nuisance odor requirements, as applicable:

a. The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]

2.5. Startup, Shutdown, and Malfunction Provisions

At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

Malfunctions must be corrected as soon as practicable after their occurrence. [40 CFR 63.6(e)]

3.0 NESHAP 6W APPLICABILITY

3.1. 40 C.F.R. Part 63 Subpart WWWWWW – Emission Standards for Plating and Polishing Operations

The permittee must comply with all applicable provisions of 40 C.F.R. §63.11504 – §63.11513 for all affected emissions to which this subpart applies by the applicable date in §63.11506. The permittee must also comply with all applicable provisions of 40 C.F.R. Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standard, please refer to 40 C.F.R. Part 63, Subpart WWWWWW.

NESHAP Subpart WWWWWW is adopted and incorporated by reference in LRAPA title 44.

3.2. NESHAP Compliance Dates

For an existing affected source (began construction or reconstruction on or before March 14, 2008), the permittee must have achieved compliance with the applicable requirements by July 1, 2010.

For a new affected source (began construction or reconstruction after March 14, 2008), the permittee must be in compliance with applicable requirements upon startup.

4.0 NON-CYANIDE ELECTROLYTIC TANKS

The requirements within this section apply to all non-cyanide electroplating, electroforming, or electropolishing tanks (hereafter referred to as 'electrolytic' process tanks) that contain one or more plating and polishing metal hazardous air pollutants and that operates at a pH of less than 12. [40 CFR 63.11507(a)]

4.1. Compliance Options and Associated Requirements

The permittee must not use any wetting agent or fume suppressants that contain per- or polyfluoroalkyl substances. For permittees that are already using these substances upon assignment to this permit attachment, the permittee may continue to use any inventory that is already purchased until the inventory is depleted. [LRAPA 37-0069(1) and OAR 340-245-0110]

The permittee must comply with all of the applicable management practices in Condition 10.0 and either 4.1(a), (b), or (c) for each affected electrolytic process tanks:

a. **Use a wetting agent/fume suppressant in the bath of the affected tank(s).**
   i. Initial Makeup: The permittee must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process; [40 CFR 63.11507(a)(1)(i)]
   ii. Additions: The permittee must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath. The permittee must retain sufficient documentation of each addition to demonstrate that wetting agent/fume suppressants added to the tank comply with the original make-up of the tank. [40 CFR 63.11507(a)(1)(ii)]
   iii. Bath Chemicals with Suppressants: If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this condition. The permittee must retain manufacturer's instructions and any associated records necessary to demonstrate that the instructions have been followed. [40 CFR 63.11507(a)(1)(iii)]
   iv. Records: The permittee must retain sufficient documentation to demonstrate that wetting agent/fume suppressants added to the tank bath are in the original make-up of the tank. The permittee must retain manufacturer information or other detailed product information (e.g., SDS) for each wetting agent/fume suppressant used in each affected tank. [40 CFR 63.11509(e) and LRAPA 34-016(1)]

b. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether wetting agent/fume suppressants are added to the bath according to the manufacturer's specifications and instructions. **Capture and exhaust emissions from the affected tank(s) to a control device. Control devices must be either a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.** [40 CFR 63.11507(a)(2) and 63.11508(d)(3)(iii)]
   i. Ongoing: The permittee must operate and maintain all control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11508(d)(2)]
   ii. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of the control device

according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]

iii. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. The permittee must maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11508(d)(4)]

iv. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the control device(s) were installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(d)(4)]

c. **Cover the surface of the affected tank(s).** [40 CFR 63.11507(a)(3)]

i. For Batch process tanks:

A. Cover Requirement: The permittee must install and use a tank cover over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time. The permittee must record the times that the tank is operated and the times the tank is covered on a daily basis.

B. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the affected tank(s) are operated with the cover in place at least 95 percent of the electrolytic process time. [40 CFR 63.11508(d)(6)]

ii. For Continuous process tanks:

A. Cover Requirement: The permittee must cover at least 75 percent of the surface area of the tank whenever the electrolytic process tank is in operation. [40 CFR 63.11508(d)(7)(i)]

B. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the tank is operated with the surface cover in place whenever the continuous electrolytic process is in operation. [40 CFR 63.11508(d)(7)(ii)]

5.0 'FLASH' OR SHORT-TERM ELECTROPLATING TANKS

The requirements within this section apply to all 'flash' or short-term electroplating tanks (AKA 'flash' process tanks) that uses or emits one or more plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(b)]

5.1. Compliance Options and Associated Requirements

The permittee must comply with all of the applicable management practices in Condition 10.0 and either 5.1(a) or (b) for each affected flash process tanks:

a. **Limit flash electroplating to no more than one (1) cumulative hour per day or three (3) cumulative minutes per hour of plating time.**

i. Operational Time: The permittee must record the times that the affected tank is operated each day.

ii. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each affected tank is limited to no more than one (1) cumulative hour per day, or three

(3) cumulative minutes per hour of plating time. [40 CFR 63.11507(b)(1) and 63.11508(d)(5)]

b. **Use a tank cover for at least 95 percent of the plating time.**

i. Cover: The permittee must install a tank cover on each affected tank and ensure the cover is in place for at least 95 percent of the plating time. The permittee must record the times that the tank is operated and the times the tank is covered on a daily basis. [40 CFR 63.11507(b)(2)]

ii. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each affected tank is operated with a cover in place for at least 95 percent of the operating time. [40 CFR 63.11508(d)(6)]

6.0 BOTH FLASH AND LONGER TERM TANK USE

For any process tank used in both flash electroplating and electrolytic processing for longer duration(s), the permittee must operate according to the requirements applicable to the specific process at any given time: [40 CFR 63.11507(c)]

- While the process tank is being used for flash electroplating, the permittee must comply with all applicable requirements of Condition 5.0.
- When the process tank is used for electroplating that does not meet the definition of flash electroplating, the permittee must comply with all applicable requirements of Condition 4.0. [40 CFR 63.11511]

The permittee must also comply with the applicable management practices in Condition 10.0.

7.0 CYANIDE-CONTAINING PROCESS TANKS

The requirements within this section apply to all electroplating tanks that use cyanide in the plating bath, operates at pH greater than 12, and contains one of more of the plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(d)]

7.1. Compliance Requirements

For each affected process tank the permittee must comply with all of the applicable management practices in Condition 10.0 and the following:

a. Measure and Record: The permittee must measure and record the pH of the bath upon startup of the bath. No additional pH measurements are required. [40 CFR 63.11507(d)(1) and 40 CFR 63.11509(e)]

b. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the pH of the of the bath solution for each affected tank was measured upon startup according to Condition 7.1a. [40 CFR 63.11508(c)(7)(i)]

8.0 DRY MECHANICAL POLISHING

The requirements within this section apply to all dry mechanical polishing machines that emit one or more of the plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(e)]

8.1. Control System, Filter, and Compliance Requirements

The permittee must operate a control system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter. [40 CFR 63.11507(e)]

a. Ongoing: The permittee must operate and maintain all control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11507(e)(1)]

b. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of each control device according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]

c. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. The permittee must maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11507(e)(2), 63.11508(d)(4)(iv) and (v), and 40 CFR 63.11509(e)]

d. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each control system was installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(c)(2)(ii)]

9.0 THERMAL SPRAYING OPERATIONS

The requirements within this section apply to each thermal spraying operation that applies one or more of the plating and polishing metal hazardous air pollutants. The permittee must comply with all of the applicable management practices in Condition 10.0. [40 CFR 63.11507(f)]

9.1. Permanent Thermal Spraying Operations

The permittee must operate a capture system that collects PM emissions from each permanent thermal spraying process and transports the emissions to a fabric, cartridge, or HEPA filter; a permanent thermal spraying operation constructed on or before March 14, 2008 may transport the emissions to a water curtain. [40 CFR 63.11507(f)(1) and (2)]

a. Control System O&M: The permittee must operate and maintain all capture and control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11508(d)(4)(i)]

b. Control System Instructions: The permittee must the maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11508(d)(4)(v)]

c. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of each control device according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]

d. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. [40 CFR 63.11508(d)(4)(iiv)]

e. Notification of Compliance Status: In addition to the notification of compliance status

requirements of Condition 12.2, the permittee must state whether each control system was installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(c)(2)(ii)]

9.2. Temporary Thermal Spraying Operations

The permittee must document the amount of time the thermal spraying occurs each day, and where it is conducted. Thermal spraying operations complying with this Condition 9.2 instead of Condition 9.1 must not operate more than one (1) hour in any one day and must meet the definition of 'temporary thermal spraying' in Condition 16.0. [40 CFR 63.11507(f)(3) and 63.11511]

a. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the management practices of Condition 10.0 have been implemented.

10.0 MANAGEMENT PRACTICES AND S.O.P.

The requirements within this section apply to all emissions units and control devices identified within Conditions 4.0 through 9.0 that contain, apply, capture, control, or emits one or more plating and polishing metal HAP (hazardous air pollutants).

10.1. Management Practices

The permittee must comply with all of the following management practices during all times that the affected tank or process is in operation, as applicable: [40 CFR 63.11507(g)]

a. Minimize Bath Agitation. The permittee must minimize bath agitation when removing any parts processed in a tank except when necessary to meet part quality requirements.

b. Maximize Draining. The permittee must maximize the draining of bath solution back into the tank by extending drip time when removing parts from the tank, using drain boards (also known as drip shields), or withdrawing parts slowly from the tank.

c. Optimize Design. The permittee must optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank).

d. Use Tank Covers. The permittee must use tank covers, if already owned and available at the facility whenever possible. Permittees must also comply with the following, as applicable: [LRAPA 37-0069(1) and OAR 340-245-0110]

   i. Permittees operating tanks that emit nickel must have tank covers installed and operated according to Condition 4.0 or 5.0, as applicable, no later than January 1, 2022 unless otherwise approved by LRAPA in writing.

   ii. Permittees that install or begin operating a new or additional tank that emits nickel after January 1, 2022 must have tank covers installed upon startup of the nickel-containing tank.

e. Minimize or Reduce Heating. The permittee must minimize or reduce heating of process tanks when doing so would not interrupt production or adversely affect part quality.

f. Perform Routine Maintenance. The permittee must perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with tanks, thermal spraying, and dry mechanical polishing equipment.

g. Minimize Contamination. The permittee must minimize bath contamination to the extent possible. Methods to be implemented may include but are not limited to: the prevention

or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, or thorough rinsing of pre-treated parts to be plated.

h. Maintain Chemicals. The permittee must maintain quality control of chemicals and other bath ingredient concentrations in the tanks.

i. Housekeeping. The permittee must perform general good housekeeping, such as regular sweeping, vacuuming, or periodic washdowns.

j. Minimize Spills. The permittee must minimize spills and overflow of tanks.

k. Use Squeegee Rolls. The permittee must use squeegee rolls in continuous or reel-to-reel plating tanks.

l. Perform Inspections. The permittee must perform regular inspections to identify leaks and other opportunities for pollution prevention.

10.2. Standard Operating Procedures

The permittee must establish and maintain a written Standard Operating Procedures manual (or equivalent) that describes how the facility's specific processes and procedures comply with each management practice of Condition 10.1. An SOP compliant with this Condition must be developed and retained on site within six (6) months of assignment to this permit attachment or upon startup, whichever is later.

For management practices that are not applicable to any emissions units on site or otherwise not implemented, the SOP must explain why (*e.g.,* 'Facility X does not implement the squeegee roll management practice because there are no continuous or reel-to-reel plating tanks on site).

11.0 RECORDKEEPING REQUIREMENTS

11.1. General Compliance and Applicability Records

The permittee must keep the following records: [40 CFR 63.11509(e) and LRAPA 34-016]

a. Notifications: A copy of all Initial Notification and Notifications of Compliance Status that are submitted and all documentation supporting those notifications.

b. Startup and Shutdowns: The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards.

c. Malfunctions: The occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the associated air pollution control and monitoring equipment.

d. Maintenance: All maintenance performed on the process equipment (tanks, dry mechanical polishing, and thermal spraying), air pollution control equipment, and monitoring equipment.

e. Continuous Compliance: The records required to show continuous compliance with each management practice and equipment standard that applies.

f. Manufacturer Documentation: The manufacturer documentation for any equipment or process that is required to comply according to manufacturer recommendations, instructions, or specifications.

g. Ampere Hours: The total ampere hours for each tank that uses or has emissions of one or more of the plating and polishing metal HAPs (cadmium, chromium, lead, manganese, nickel).

i. Permittees being reassigned to this permit attachment without the equipment necessary to monitor tank ampere hours may request that LPAPA provide additional time for the procurement and installation of this equipment.

ii. Requests must be submitted in writing to LRAPA no later than 30 days after assignment to this permit attachment and include a description of the equipment that will need to be procured and an estimated date on which the permittee believes installation will be completed.

iii. Requests must be submitted to the appropriate address in Condition 13.2. LRAPA may approve additional time but will require the installation and operation of equipment which provides for tank ampere hour recordkeeping no later than July 1, 2022.

11.2. Excess Emissions

Unless otherwise specified, the permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.

11.3. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to LRAPA upon request. The permittee must maintain at least the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review during an on-site inspection. [40 CFR 63.11509(f) and LRAPA 34-016(5)]

11.4. Complaint Log

The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee must investigate the condition within 24 hours, if possible.

The log must include at least the following for each complaint or concern received: [LRAPA 34-016(1)]

a. The date the complaint was received;
b. The date and time the complaint states the condition was present;
c. A description of the complaint;
d. The location of the complainant or receptor relative to the plant site;
e. The status of plant operations and activities during the complaint's stated time of pollution or odor condition;
f. A description of the permittee's actions to investigate the validity of the complaint; and
g. A description of any actions taken in response to the complaint investigation.

12.0 REPORTING REQUIREMENTS

12.1 NESHAP Initial Notification

The permittee must submit an initial notification if one has never been submitted, if the source is newly constructed and beginning operations, or upon request by LRAPA. An initial notification must comply the following: [40 CFR 63.11509(a)]

a. Source Information Required: The notification must include the name and address of the owner or operator, the address (physical location) of the affected source, an identification of the relevant standard (NESHAP 6W), the permittee's compliance date, identification of the emission points at the permitted facility, types of hazardous air pollutants emitted, and a brief description of the nature, size, design, and method of operations;

b. Compliance Methods: The notification must include a description of the compliance method(s) (e.g., use of wetting agent/fume suppressant) for each affected emissions unit;

c. Due Date: The initial notification is due to LRAPA within 120 days of the source becoming subject to NESHAP 6W.

d. Where to Send: Initial notifications must be submitted to the LRAPA office:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

12.2. NESHAP Notification of Compliance Status

The permittee must submit a notification of compliance status if one has never been submitted, if the source is newly constructed and beginning operations, or upon request by LRAPA.

If the permittee makes any changes that result in inaccurate information on the most recently submitted Notification of Compliance Status, the permittee must submit an amended notification of compliance status within 30 days of the change. The report information for which changes would require an amended notification are identified below with '30-day change notification required'.

The Notification of Compliance Status report must comply with all of the following: [40 CFR 63.11509(b)]

a. Information Required. The report must contain the following information:

i. List of affected emissions units (tanks, thermal spraying, and dry mechanical polishing) and whether cadmium, chromium, lead, manganese, or nickel are used in, or emitted by, those emissions units **[30-day change notification required]**;

ii. Identification or description of the methods used to comply with the applicable management practices and equipment standards;

iii. Description of the capture and emission control systems used to comply with the applicable equipment standards **[30-day change notification required]**;

iv. Additional information, as applicable, identified under 'Notification of Compliance Status' throughout this permit attachment for each emissions unit. (Note that each type of emissions unit covered by this permit attachment identifies

unique information that must be included with the Notification of Compliance Status); and

v. A statement by the owner or operator of the facility as to whether all management practices required by Condition 10.0 have been implemented.

vi. A statement by the owner or operator of the facility as to whether the source is in compliance with the applicable standards and requirements. **[30-day change notification required]**

b. Due Dates: A new affected source is required to submit a notification of compliance status before close of business on the date of initial startup. An existing source was required to submit a notification of compliance status no later than July 1, 2010.

c. Where to Send: The first Notification of Compliance Status must be submitted to the LRAPA office as listed below. Amended notifications of compliance status must be submitted to the LRAPA as listed below.

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

12.3. Annual Report

For each year this permit attachment is in effect, the permittee must submit to LRAPA by **February 15** one (1) copy of an annual report for the previous calendar year that includes at least the following: [LRAPA 34-016(1)&(2) and 40 CFR 63.11509(c)]

a. A statement or certification of whether all applicable management practices have been implemented on site; [40 CFR 63.11508(d)(8)(i)]

b. A statement certifying whether any deviations of the requirements of this permit attachment occurred during the reporting period. If any deviations occurred, the annual report must also include: [40 CFR 63.11509(d)]

i. Identification of the process tank or operation associated with the deviation;
ii. The date and time the deviation occurred;
iii. The permit Condition or description of the compliance requirement deviated from; and
iv. A description of the deviation and a description of the correction action(s) taken.

c. A summary of complaints received relating to air quality concerns and the permittee's response or follow-up action(s); [LRAPA 34-016(5)]

d. A description of any permanent changes made to processes or equipment that may affect air emissions;

e. **For each electrolytic process tank using wetting agents or fume suppressants** to comply with Condition 4.1, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(3)]

i. The process or tank name or identification number;
ii. The type of electrolytic process;
iii. The name and type of wetting agent or fume suppressant used and the date(s) of each addition;
iv. A statement certifying that per- or polyfluoroalkyl substances are not used on site or a statement certifying how much of these products remain on site; and
v. Certification that the addition(s) were completed following the manufacturer's specifications and instructions.

f. **For each electrolytic process tank, dry mechanical polishing operation, and thermal**

spraying operation complying with the applicable requirements by using a control device, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(4)]

i. The process, operation, or tank name or identification number;
ii. The type of electrolytic process or other operation; and
iii. Certification that the control device(s) and system(s) were operated and maintained according to manufacturer's specifications and instructions.

g. **For each flash process tank limiting the hours or minutes** to comply with Condition 5.1, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(5)]
   i. The tank name or identification number;
   ii. The process or tank type; and
   iii. Certification that the tank was limited to one hour per day or 3 minutes per hour.

h. **For each batch electrolytic process tank and each flash process tank using a cover** to comply with Condition 4.1.c or 5.1.b, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(6)]
   i. The tank name or identification number;
   ii. The process or tank type; and
   iii. Certification that the tank was operated with the cover in place for at least 95% of the electrolytic processing time.

i. **For each continuous electrolytic process tank using a cover** to comply with Condition 4.1.c, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(7)]
   i. The tank name or identification number;
   ii. The process or tank type; and
   iii. Certification that the tank was operated with at least 75% of the tank surface area covered during all electrolytic processing time.

j. Total ampere hours for each tank that uses or has emissions of one or more of the plating and polishing metal HAPs (cadmium, chromium, lead, manganese, nickel). [LRAPA 34-016(5)]

12.4. Excess Emissions

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

a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 13.2.
b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
c. The permittee must submit follow-up reports when required by LRAPA.

12.5. Initial Startup Notice

The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.

12.6. Notice of Change of Ownership of Company Name

The permittee must notify LRAPA in writing using a LRAPA "Transfer Application Form" within 60 days after any of the following:

a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
b. Sale or exchange of the activity or facility.

12.7. Construction of Modification Notices

The permittee must notify LRAPA in writing using a LRAPA "Notice of Intent to Construct Form," or other permit application form, and obtain approval in accordance with LRAPA title 34 before:

a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
c. Constructing or modifying any air pollution control equipment.

12.8. Where to Send Reports and Notices

The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 13.2.

13.0 ADMINISTRATIVE REQUIREMENTS

13.1. Reassignment to the General ACDP

A permittee that wishes to continue assignment to this General ACDP must submit to LRAPA an application for reassignment as follows:

a. The application must be received by LRAPA within 30 days prior to the expiration date listed on this permit attachment;
b. The application must be sent to the LRAPA office identified in Condition 13.2.; and
c. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application.

13.2. Permit Coordinator Addresses

All reports, notices, and applications should be directed to LRAPA as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
541-736-1056

13.3. LRAPA's web site

Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

14.0 FEES

14.1. Annual Compliance Fee

The annual fees specified in LRAPA 37-0020, Table 2, Part 2 and 3 are due on or by **December 1** of each year this permit attachment is in effect. Invoices indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

14.2. Change of Ownership or Company Name Fee
The Non-Technical Permit Modification specific activity fee specified in LRAPA 37-0020, Table 2, Part 4 is due with an application for changing the ownership or the name of the company of a source assigned to this permit attachment. Forms that require fees must be sent together to the address in Condition 14.3.

14.3. Where to Submit Fees
Fees, with a permit number prominently displayed, must be submitted to:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

15.0 GENERAL CONDITIONS AND DISCLAIMERS

15.1. Other Regulations
In addition to the specific requirements listed in this permit attachment, the permittee must comply with all other applicable legal requirements enforceable by LRAPA.

15.2. Conflicting Conditions
In any instance in which there is an apparent conflict relative to conditions in this permit attachment, the most stringent conditions apply.

15.3. Masking of Emissions
The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.

15.4. LRAPA Access
The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit attachment in accordance with ORS 468.095.

15.5. Permit Availability
The permittee must have a copy of the permit available at the facility at all times.

15.6. Outdoor Burning
The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.

15.7. Asbestos
The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.

15.8. Property Rights
The issuance of this permit attachment does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

15.9. Termination, Revocation, Rescission, or Modification
LRAPA may modify or revoke this permit attachment as authorized under LRAPA title 37.

16.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

6W	40 C.F.R. part 63 subpart WWWWWW as adopted in OAR chapter 340 division 244
ACDP	Air Contaminant Discharge Permit
AQGP	Air Quality General Permit
AQMA	Air Quality Maintenance Area
calendar year	The 12-month period beginning January 1st and ending December 31st
CAO	Cleaner Air Oregon
Cd	Cadmium
C.F.R.	Code of Federal Regulations
Cr	Chromium
DEQ	Oregon Department of Environmental Quality
EPA	US Environmental Protection Agency
HAP	Hazardous Air Pollutant as defined by LRAPA title 44
HEPA	high efficiency particulate air
LRAPA	Lane Regional Air Protection Agency
Metal HAP	Cadmium, chromium, nickel, manganese, and lead

Mn	Manganese
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
Ni	Nickel
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
O&M	operation and maintenance
Pb	lead
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
PSEL	Plant Site Emission Limit
SDS	Safety Data Sheet
SIC	Standard Industrial Code
SOP	Standard operating procedures
VE	visible emissions
VOC	volatile organic compound
year	A period consisting of any 12-consecutive calendar months

Definition:
Temporary Thermal Spraying means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in Condition 1.1.b, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying. [40 CFR 63.11511]

Jce: 03/02/10
MKH 05/05/11: rcl 8/30/11
DRD 6/1/20. MKH 10/12/21:rr 12/1/21
AQGP-026a plating and polishing

Lane Regional Air Protection Agency

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

PLATING AND POLISHING

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from plating and polishing operations subject to the Plating and Polishing Operations National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR part 63 subpart WWWWWW). The Plating and Polishing Operations NESHAP regulates facilities engaged in one or more of the following operations that uses, or has emissions of, compounds of one or more plating and polishing metal Hazardous Air Pollutant (HAP). Plating and polishing metal HAP means any compound of the following metals: cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and nickel (Ni). With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

    - Electroplating other than chromium electroplating (i.e., nonchromium electroplating)
    - Electroless or non-electrolytic plating
    - Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying
    - Dry mechanical polishing of finished metals and formed products after plating
    - Electroforming
    - Electropolishing

2. This General Permit does not apply to activities that are included in the exemptions from the Plating and Polishing Operations NESHAP as follows:

    - Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).
    - ~~Research and development process units, as defined in 40 CFR 63.11511.~~
    - Process units that are used strictly for educational purposes.

- Thermal spraying conducted to repair surfaces;
- Dry mechanical polishing conducted to restore the original finish to a surface to apply to restoring the original finish
- Any plating or polishing process that does not use any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Safety Data Sheet for the material

3. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities as defined under LRAPA Title 12. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.

4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.

5. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

6. Facilities assigned to this General Permit are sources of particulate matter (PM) and hazardous air pollutant (HAP) emissions.

7. LRAPA 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 of federal hazardous air pollutants and compliant with applicable emission limits.

SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA titles 32 and 48. The permit contains requirements and limitations to ensure compliance with these standards.

9. The General Permit incorporates the regulations in 40 CFR part 63 subpart HHHHHH for the Plating and Polishing Operations NESHAP. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on July 1, 2008. This NESHAP is adopted in LRAPA Title 44.

10. Oregon DEQ conducted a general activity-based risk screening for plating and polishing sources. This permit requires that sources with nickel-emitting tanks install tank covers on a specified timeline, unless otherwise approved by LRAPA. Approval to not install tank covers will be limited to facilities that demonstrate that all nickel-containing tanks are controlled by a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator. Additionally, facilities must not use any wetting agent or fume suppressants that contain per- or polyfluoroalkyl substances. Permittees can use existing purchased inventory of these fume suppressants until they are exhausted.

COMPLIANCE ASSURANCE

11. Permittees are required to maintain records of notifications, startup and shutdowns, malfunctions, maintenance activities, production, compliance, work practice activities, and complaints received at the facility that relate to air pollution concerns. These items are reported to LRAPA annually, as applicable.

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

REVOCATION OF ASSIGNMENT

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

PUBLIC NOTICE

14. General Air Contaminant Discharge Permits are authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public was provided at least 30 days to submit written comments. There were no comments received during the public comment period.

DEFINITIONS

15. The terms not defined in the General Permit use the definitions found in LRAPA title 12, 40 CFR part 63 subpart A (General Provisions §63.2), or 40 CFR part 63 subpart WWWWWW (§63.11511).

Batch electrolytic process tank means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

Bench-scale means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

Composite mesh pad means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

Continuous electrolytic process tank means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

Cyanide plating means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry.

Deviation means any instance in which an affected source fails to meet any Condition of the permit. This includes but is not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement. Deviation also includes failing to meet any Condition of this permit during startup, shutdown, or malfunction.

Dry mechanical polishing means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

Electroless plating means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

Electrolytic plating processes means electroplating and electroforming that use or emit any of the plating and polishing metal HAP where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

Electroplating means an electrolytic process that uses or emits any of the plating and polishing metal HAP in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

Electropolishing means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this permit, electropolishing does not include bench-scale operations.

Flash electroplating (or short-term electroplating) means an electrolytic process performed in a tank that uses or emits any of the plating and polishing metal HAP and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

Mesh pad mist eliminator means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

Metal HAP content of material used in plating and polishing means either 1) for plating, metal coating, or electropolishing this is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution; or 2) for thermal spraying this is the HAP content of the metal coating being applied. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates.

Non-cyanide electrolytic plating and electropolishing processes means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

Non-electrolytic plating means a process that uses or emits any of the plating and polishing metal HAP in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, electroless nickel plating, sodium dichromate sealing, and manganese phosphate coating.

Plating and polishing facility means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP: electroplating processes other than chromium electroplating (i.e., non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes performed in a tank, such as chromate conversion

coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

Plating and polishing metal HAP means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. 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 reported on the Material Safety Data Sheet for the material, is considered to be a plating and polishing metal HAP.

Repair means any process used to return a finished object or tool back to its original function or shape.

Short-term electroplating: (see flash electroplating).

Startup of the tank bath is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

Temporary thermal spraying means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

Thermal spraying (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.