



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

AUTHORITY TO CONSTRUCT

B015303

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

EXPIRES LAST DAY OF: AUGUST 2025

OWNER OF OPERATOR (Co.#342)

Smith Ironworks
17671 Bear Valley Road
Hesperia, CA 92345

EQUIPMENT LOCATION (Fac.#1004)

Endura Steel, Inc
17671 Bear Valley Road
Hesperia, CA 92345

Description:

WELDING OPERATIONS consisting of: Twelve (12) Welding Units, Manufacturer TBD, Model Number TBD, Serial Numbers TBD.

CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants.

[District Rule 204]

2. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

[District Rule 204]

3. This equipment is to be operated solely on commercial line power, an internal combustion engine less than 50 bhp exempt from permit or an internal combustion engine with a valid district permit.

[District Rule 1302 and 1320]

4. This facility is limited to gas metal arc welding (GMAW) only.

[40 CFR 63.11516(f)(2)]

[District Rules 1302 and 1320]

Fee Schedule: 3 (b)

Rating: 300kVA

SIC: 3441

SCC: 30900500

Location/UTM(Km): 475E/3815N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Smith Ironworks
17671 Bear Valley Road
Hesperia, CA 92345

By: **COPY**

Brad Poiriez

Air Pollution Control Officer

5.The following wire throughput limits apply to the aggregate use for all welding units located at the facility:

- a. FCAW: 15,972 lb/consecutive twelve month period
 - b. GWAM: 3,564 lb/consecutive twelve month period
- [40 CFR 63.11516(f)(2) and District Rule 1320]

6.The owner/operator shall maintain a log for this welding operation, which, at a minimum, contains the information specified below.

This log shall be maintained current and on-site for a minimum of two (2) years and shall be provided to District personnel on request:

- a. Date of each use;
 - b. Duration of each use, in minutes;
 - c. Manufacturer, type and trade name of welding wire used;
 - d. A current Material Safety Data Sheet (SDS) for each welding wire used;
 - e. Total pounds of each welding wire consumed and the type of welding performed (GMAW, FCAW) per each consecutive twelve month period;
 - f. Total pounds of each welding wire consumed per each consecutive twelve month period which contain Metal Fabrication Hazardous Air Pollutant (MFHAP) containing material defined as cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (SDS);
 - g. Visual Emissions Determinations as required in condition #15-18;
 - h. Copy of initial notification as required by 40 CFR 63.11519(a)and condition #19; and,
 - i. Copy of annual certifications 40 CFR 63.11519(b)and condition #10.
- [District Rule 1320 and 40 CFR Subpart 63 Section 63.11516(f)(3)-(8)]

7.This facility shall operate in compliance at all times with District Rules 401 - Visible Emissions, 402 - Nuisance and 403 - Fugitive Dust.

8.This facility is subject to 40 CFR 63, Subpart XXXXXX - National Emission Standard for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and must comply with all requirements of this regulation as applicable.

9.This facility uses material containing MFHAP and must operate in compliance with the applicable provisions of this NESHAP [40 CFR 63.11515(b)]. Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

10.This facility must not conduct any dry abrasive blasting as defined under 40 CFR 63.11522. Dry blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

[40 CFR 63.11516(a)]

11.The owner/operator must ensure that all machining conducted at this facility is done in a manner to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and operate all equipment associated with machining according to manufacturer's instructions. Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

[40 CFR 63.11516(b)]

12.This facility must not conduct any dry grinding or polishing with machines as defined under 40 CFR 63.11522. Dry grinding and polishing with machines means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

[40 CFR 63.11516(c)]

13.This facility must not conduct any spray painting that contains MFHAP.
[40 CFR 63.11516(d)]

14.The owner/operator must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The owner/operator must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in 40 CFR 63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."
[40 CFR 63.11516(f)(1)]

15.Visible emissions Tier 1 requirements - Owner/operator must perform visual determinations of welding fugitive emissions as specified in permit condition 15 at the primary vent, stack, exit, or opening from the building containing the welding operations. Owner/operator must keep a record of all visual determinations of fugitive emissions along with any corrective action taken
[63.11519(c)(2)]

If visible fugitive emissions are detected during any visual determination, owner/operator must:

Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures perform a follow-up inspection for visible fugitive at the primary vent, stack, exit, or opening from the building containing the welding operations.

Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report

[40 CFR 63.11516(f)]

The owner/operator must conduct Visual Emissions Determinations (VED) as required by 40 CFR 63.11517 according to the procedure and schedule outlined in section 63.11517. Results of the VEDs must be documented and maintained as part of the recordkeeping requirements specified in condition #6.

Visual determination of fugitive emissions, graduated schedule. Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(1) Daily Method 22 Testing. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) Click to open paragraph tools Weekly Method 22 Testing. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, owner/operator may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, owner/operator must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) Monthly Method 22 Testing. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, owner/operator may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, owner/operator must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) Quarterly Method 22 Testing. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, owner/operator may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, owner/operator must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

16.Visible Emissions Tier 2 requirements - If visible fugitive emissions are detected more than once during any consecutive 12 month period, owner/operator must:

(a) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, owner/operator must conduct a visual determination of emissions opacity, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(b) perform visual determinations of emissions opacity in accordance with § 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations

(c) keep a record of each visual determination of emissions opacity performed along with any subsequent corrective action taken

(d) report the results of all visual determinations of emissions opacity performed in accordance with permit condition X, along with any subsequent corrective action taken, and submit with the annual certification and compliance report

Requirements for opacities greater than zero but less than 20% - for each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, owner/operator must perform

corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2)
[40 CFR 63.11516(f)]

17. Visible emissions Tier 3 requirements for opacities exceeding 20 percent. For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, owner/operator must :

(a) submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report
Within 30 days of the opacity exceedance, prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in 63.11516(f)(8). If owner/operator has already prepared a Site-Specific Welding Emissions Management Plan in accordance with these requirements, owner/operator must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, owner/operator must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in § 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(b) maintain records of daily visual determinations of emissions opacity performed, during preparation of the Site-Specific Welding Emissions Management Plan, and include these records in the annual certification and compliance report.

[40 CFR 63.11516(f)]

18. Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule:

(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.

(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 EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, owner/operator may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, owner/operator must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(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 EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, owner/operator may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, owner/operator must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(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 EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, owner/operator may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, owner/operator must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(e) Return to Method 22 testing for welding, Tier 2 or 3. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, owner/operator may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, owner/operator may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

[40 CFR 36.11517]

19. Initial Notification requirements:

Within 120 days of permit issuance, the o/o shall submit an initial notification pursuant to 40 CFR 63.11519 which includes:

- (i) The name, address, phone number and e-mail address of the owner and operator;
- (ii) The address (physical location) of the affected source;
- (iii) An identification of the relevant standard (i.e., this subpart); and
- (iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

Within 120 days of permit issuance, the o/o shall submit a notification of compliance status pursuant to 40 CFR 63.11519 which

includes:

- (i) Company name and address;
 - (ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;
 - (iii) If owner/operator operates any spray painting affected sources, the information required by § 63.11516(e)(3)(vi)(C) or § 63.11516(e)(4)(ix)(C) as applicable; and
 - (iv) The date of the notification of compliance status.
- [40 CFR 63.11519(a)]

20. The o/o shall submit an annual compliance certification and compliance report. The first annual certification and compliance report must cover the first annual reporting period which begins the day the permit is issued and ends on December 31.

Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31 and submitted to reporting@mdaqmd.ca.gov no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31 during which the equipment is operated and MFHAP containing material is used.

The report shall include:

- (i) Company name and address;
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

Tier I

- (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
- (ii) A description of the corrective actions taken subsequent to the test; and
- (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

Tier II - if applicable

- (i) The date of every visual determination of emissions opacity;
- (ii) The average of the six-minute opacities measured by the test; and
- (iii) A description of any corrective action taken subsequent to the test.

Tier III - if applicable

an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with the annual certification and compliance report and must contain the date on which the exceedance occurred; and the average of the six-minute average opacities recorded during the visual determination of emissions opacity.

Owner/operator must submit a copy of the records of daily visual determinations of emissions recorded in accordance with the Tier 3 requirements for opacities exceeding 20 percent," and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to along with the annual certification and compliance report

[40 CFR 63.11519(b)]

21. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.

[District Rule 107(b), Health & Safety Code 39607 & 44341-44342, 17 CCR 93400 et seq., and 40 CFR 51, Subpart A]