



AIR QUALITY CLASS I OPERATING PERMIT

PERMIT NUMBER: OP26R1-018

DWEE ID: 35548

Program ID: AIR 119 00012

Permit Issued To: Nucor Corporation

Name of Source in Application: Nucor Corporation, by and through its Vulcraft Nebraska Division

Mailing Address: 1601 West Omaha Avenue, Norfolk, Nebraska 68702-0059

Source Location: 1601 West Omaha Avenue, Norfolk, Madison County, Nebraska

Project Description: This operating permit approves the operation of a source that manufactures steel joists, bridging, decking, and miscellaneous metal products.

Standard Industrial Classification (SIC) Code(s): 3441, Fabricated Structural Metal; 3444 Sheet Metal Work

North American Industry Classification System (NAICS) Code: 332312, Fabricated Structural Metal Manufacturing; 332322, Sheet Metal Work Manufacturing

Superseded Operating Permit(s): Operating permit OP21R1-026 issued January 26, 2022, and operating permit minor revision OP24M1-015 issued April 30, 2024.

Pursuant to Title 129, Chapter 14, of the Nebraska Air Quality Regulations, the public has been notified by prominent advertisement of the proposed operation of an air contaminant source and the thirty (30) day period allowed for comments has elapsed. This Operating Permit approves the operation of a source that manufactures steel joists, bridging, decking and miscellaneous metal products. This Operating Permit approves the operation of this source as identified in the Air Quality Operating Permit Application OP26R1-018 received May 8, 2026, including any supporting information received prior to issuance of this permit. Additional details on the source, including estimated pollutant emissions, can be found in the accompanying Fact Sheet.

Compliance with this permit shall not be a defense to any enforcement action for violation of an ambient air quality standard. Unless otherwise noted the conditions of this permit are enforceable by the United States Environmental Protection Agency (USEPA) and the Nebraska Department of Water, Energy, and Environment (DWEE). The permit holder, owner, and operator of the source shall assure compliance with all of the terms and conditions in this permit and the Attachments.

The undersigned issues this document on behalf of the DWEE Director in accordance with Title 129 – Nebraska Air Quality Regulations.

DRAFT

DRAFT

Date

Reuel S. Anderson, Administrator
Permitting & Engineering Division

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ABBREVIATIONS, SYMBOLS, and UNITS OF MEASURE

AP-42	Compilation of Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources	NESHAP	National Emission Standards for Hazardous Air Pollutants
BACT	Best Available Control Technology	NO ₂	Nitrogen Dioxide
Btu	British Thermal Unit	NO _x	Nitrogen Oxides
bu	Bushel	N ₂ O	Nitrous Oxide
CAA	Clean Air Act	NSPS	New Source Performance Standard
CE	Control Equipment	NSR	New Source Review
cf	Cubic Feet	OP	Operating Permit
CFC	Chlorofluorocarbons	PAL	Plant-wide Applicability Limit
CEMS	Continuous Emissions Monitoring System	Pb	Lead
CFR	Code of Federal Regulations	PEMS	Predictive Emissions Monitoring System
CO	Carbon Monoxide	PM	Particulate Matter
CO ₂	Carbon Dioxide	PM _{2.5}	Particulate Matter with an aerodynamic diameter equal to or less than 2.5 microns
CO _{2e}	Carbon Dioxide Equivalent	PM ₁₀	Particulate Matter with an aerodynamic diameter equal to or less than 10 microns
COMS	Continuous Opacity Monitoring System	PM ₁₀ (total)	Filterable and condensable particulate matter
CP	Construction Permit	ppb	Parts per Billion
Director	Director of the DWEE	ppm	Parts per Million
dscf	Dry Standard Cubic Feet	ppmv	Parts per Million by Volume
dscfm	Dry Standard Cubic Feet per Minute	ppmvd	Parts per Million by Volume, dry basis
DWEE	Nebraska Department of Water, Energy, and Environment	PSD	Prevention of Significant Deterioration
EMIS	Emergency Management Information System	PTE	Potential to Emit
EQC	Environmental Quality Council	scf	Standard Cubic Feet
EP	Emission Point	SIC	Standard Industrial Classification
EU	Emission Unit	SIP	State Implementation Plan
FIP	Federal Implementation Plan	SO ₂	Sulfur Dioxide
FR	Federal Register	SO _x	Sulfur Oxides
ft	Feet	Title 129	Title 129, Nebraska Air Quality Regulations
FTIR	Fourier Transform Infrared	TDS	Total Dissolved Solids
GHGs	Greenhouse Gases	tpy	Tons per year
HAP	Hazardous Air Pollutant(s)	TRS	Total Reduced Sulfur
hp	Horsepower	TSP	Total Suspended Particulate Matter
hr	Hour	USEPA	United States Environmental Protection Agency
lb	Pound	UTM	Universal Transverse Mercator
LDAR	Leak Detection and Repair	VHAP	Volatile Hazardous Air Pollutant
LNB	Low NO _x Burner	VMT	Vehicle Miles Traveled
MACT	Maximum Achievable Control Technology	VOC	Volatile Organic Compound
Mgal	One Thousand Gallons	yr	Year
MMBtu	One Million British Thermal Units		
MMgal	One Million Gallons		
MMscf	One Million Standard Cubic Feet		
SDS	Material Safety Data Sheet		
n/a	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

I. STANDARD CONDITIONS

The following Standard Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit.

(A) Regulatory authority:

- (1) Title 40 Protection of Environment, Code of Federal Regulations that apply to the source including those found at 40 CFR Part 52, Subpart CC or 40 CFR Part 70, Appendix A (federally enforceable requirements); and
 - (a) The State Implementation Plan (SIP) approved Title 129 as amended September 28, 2022, cited in this permit and denoted by an asterisk (*) are federally enforceable. When Title 129 as amended June 28, 2026, cited in this permit becomes SIP approved and federally enforceable it will supersede Title 129 as amended September 28, 2022.
- (2) The Environmental Protection Act, Neb. Rev. Stat. §§ 81-1501 to 81-1532, and Nebraska Administrative Code Title 129 as amended June 28, 2026 (Title 129).

(B) The source shall allow the DWEE, USEPA or an authorized representative, upon presentation of credentials (Neb. Rev. Statute §81-1504; Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11) to:

- (1) Enter upon the source's premises during reasonable hours where a source subject to this permit is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (2) Have access to and copy, during reasonable hours, any records that must be kept under the conditions of this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (3) Inspect during reasonable hours any facilities, pollution control equipment, including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit, for the purpose of ensuring compliance with this permit or applicable requirements;
- (4) Sample or monitor, during reasonable hours, substances or parameters for the purpose of ensuring compliance with the permit or applicable requirements.

(C) All requested permit amendments and revisions must adhere to the requirements of Title 129, Chapter 9*; Title 129, Chapter 9.

(D) The following methods may be used to determine compliance with the term and conditions in this permit ((Title 129, Chapter 15, Section 005.08)*; Title 129, Chapter 15, Section 005.08):

- (1) Any compliance test method specified in the State Implementation Plan;
- (2) Any test or monitoring method approved for the source in a permit issued pursuant to Title 129, Chapters 3*, 4*, or Chapter 13, Section 004*; Title 129, Chapters 3, 4, or Chapter 13, Section 004;
- (3) Any test or monitoring method provided for in Title 129; or
- (4) Any other test, monitoring, or information-gathering method that produces information comparable to that produced by any method described in Condition I.(D)(1) through (3).

(E) Application for review of plans or advice furnished by the Director will not relieve the source of legal compliance with any provision of these regulations or prevent the Director from enforcing or implementing any provision of these regulations ((Title 129, Chapter 1, Section 001.06)*; Title

129, Chapter 1, Section 001.06).

- (F) If and when the Director declares an air pollution episode as defined in Title 129, Chapter 2, Section 006.01*; Title 129, Chapter 2, Section 006.01, the source shall immediately take all required actions listed in Title 129, Appendix II, Paragraph 1.1*, 1.2*, and 1.3*; Title 129, Appendix II, Paragraph 1.1, 1.2, and 1.3, respectively, until the Director declares the air pollution episode terminated ((Title 129, Chapter 2, Section 006.03)*; Title 129, Chapter 2, Section 006.03).
- (G) Recordkeeping: To ensure compliance with this permit, records shall be maintained as outlined below. Records include: electronic and/or paper copies of all application materials, notifications, reports, test protocols, test results, and plans; and, electronic and/or original paper copies of all required monitoring results, measurements, inspections, and observations (Title 129, Chapter 15, Section 005.06*; Title 129, Chapter 15, Section 005.06; Neb. Rev. Stat. §81-1504):
- (1) All records required by this permit shall be kept for a minimum of five (5) years and shall be clear and readily accessible to DWEE representatives during an inspection, unless otherwise specified in this permit.
 - (2) Monthly calculations and records required throughout this permit shall be compiled no later than the fifteenth (15th) day of each calendar month and shall include all records and calculations generated through the previous calendar month, unless otherwise specified in this permit. ((Title 129, Chapter 6, Section 003.03)*; Title 129, Chapter 6, Section 003.03).
 - (3) The source shall keep the following records for each malfunction, start-up and shutdown where emissions were, or may have been, in excess of an emission limitation or standard ((Title 129, Chapter 11, Sections 002* and 005*, Chapter 15, Sections 006.02*, 006.04*, and 006.05)*; Title 129, Chapter 11, Sections 002 and 005, Chapter 15, Sections 006.02, 006.04, and 006.05):
 - (a) The identity of the equipment.
 - (b) Reason for, or cause of, the malfunction, shutdown, or start-up.
 - (c) Duration of period of excess emissions.
 - (d) Date and time of the malfunction, shutdown, or start-up.
 - (e) Physical and chemical composition of pollutants whose emissions are affected by the action.
 - (f) Methods, operating data, and/or calculations used to determine these emissions.
 - (g) Quantification of emissions in the units of the applicable emission control regulation.
 - (h) All measures utilized to minimize the extent and duration of excess emissions during the malfunction, shutdown, and start-up.
 - (4) The source shall keep records of maintenance performed on components of permitted emission units that would affect or potentially affect the emission rate of that unit and on control and monitoring equipment associated with the permitted emission unit ((Title 129, Chapter 15, Sections 005.06*, 006.06B* and 006.06E)*; Title 129, Chapter 15, Sections 005.06, 006.06B and 006.06E).
 - (5) All records of opacity readings, instrument readings, visual equipment inspections, logbook/sheet entries, and any other record of equipment performance shall identify the individual who entered the record, except for continuously generated electronic records.

- (6) Operation and maintenance manuals, or equivalent documentation, detailing proper operation and maintenance of all permitted emission units, required control equipment and required monitoring equipment shall be kept for the life of the equipment.
- (H) All permitted emission units, associated emissions conveyances, required control equipment, and required monitoring equipment shall be properly installed, operated, and maintained (Title 129 Chapter 6, Sections 003.01* and 003.13*; Chapter 15, Section 005.06*; Title 129 Chapter 6, Sections 003.01 and 003.13; Chapter 15, Section 005.06; Neb. Rev. Stat. §81-1504 and §81-1506).
 - (1) All emissions from emission units using required controls shall be captured and routed through associated emission conveyances to the required control equipment, except for uncaptured emissions described in the permit application and any additional information submitted prior to permit issuance.
 - (2) All equipment must be maintained to minimize the amount of uncontrolled pollutants that are released to the atmosphere. Proper equipment maintenance activities may include repair or replacement, and include, but are not limited to activities in response to the following:
 - (a) cracks, holes or gaps,
 - (b) broken, cracked, or otherwise damaged seals or gaskets, and
 - (c) broken, missing or open hatches, access covers, caps, or other closure devices.
- (I) When the source makes physical or operational changes to an emissions unit or associated control equipment that may cause an increase in emissions that makes the original testing not representative of current operating conditions or emissions, the source shall submit a notification of the change. Such notification shall be received by DWEE within fifteen (15) days after such change. The DWEE may require performance testing based on review of the specific changes identified in the notification and the resulting potential impact on emissions from the unit(s) and/or performance of the control equipment ((Title 129, Chapter 15, Section 005.01)*; Title 129, Chapter 15, Section 005.01).
 - (1) This notification requirement applies to emissions units and/or control equipment that meet the following requirements, except as provided in Condition I.(I)(5):
 - (a) Emissions from the emissions unit and/or control equipment is subject to an emissions limit;
 - (b) A valid performance test has been conducted for the pollutant to which the emissions limit applies;
 - (c) Changes that may cause emissions to increase or invalidate prior testing include, but are not limited to, increasing the capacity of an emissions unit, changing the operational parameters of any control equipment outside of the range allowed for under this permit that makes the control equipment less efficient, changing the type of scrubber packing, or increasing the inlet pollutant loading of any control equipment.
 - (2) For emission units that have had a performance test conducted after January 1, 2012, the source shall make a one-time notification to the DWEE within fifteen (15) days of when there is a 10% increase in daily production/throughput rate, over the tested rate recorded during the most recent valid performance test unless otherwise specified in this permit. If there are subsequent 10% increases over the rate most recently notified to the DWEE, the source shall make a one-time notification to the DWEE of each such subsequent increase. This will not apply to emissions that already have emission rates that are normalized to production and/or throughput rates.

- (3) The notification shall include the date of the changes, a description of the changes made, and an evaluation of the expected impact on emissions from the emissions units and/or control equipment.
- (4) The following definitions apply for purposes of Condition I.(I)(2) above:
 - (a) “rate” shall mean the production or throughput of an emissions unit in the same units of production or throughput as the “tested rate” as defined below; and,
 - (b) “tested rate” shall mean the production or throughput rate of an emissions unit as recorded in the most recent valid performance test and reported to the DWEE in the source’s written copy of the test results, or test report, documenting the maximum capacity of the unit(s). The tested rate shall be extrapolated to daily. Examples include, but are not limited to, tons per hour to tons per day or gallons per hour to gallons per day.
- (5) The above notification requirements do not apply when compliance with the emission limitation is demonstrated through the use of a CEMS, PEMS or COMS.
- (J) No person shall cause or allow emissions, from any source, which are of an opacity equal to or greater than twenty percent (20%), as evaluated by an EPA approved method, or recorded by a continuous opacity monitoring system operated and maintained pursuant to 40 CFR Part 60 Appendix B except as provided for in Title 129, Chapter 15, Sections 001.05* or 001.06*; Title 129, Chapter 15, Sections 001.05 or 001.06 ((Title 129, Chapter 15, Section 001.04)*; Title 129, Chapter 15, Section 001.04).
- (K) Open fires are prohibited except as allowed by Title 129, Chapter 15, Section 002*; Title 129, Chapter 15, Section 002.
- (L) Particulate Matter – General Requirements ((Title 129, Chapter 15, Section 003)*; Title 129, Chapter 15, Section 003):
 - (1) The source shall not cause or permit the handling, transporting or storage of any material in a manner which allows particulate matter to become airborne in such quantities and concentrations that it remains visible in the ambient air beyond the property line.
 - (2) The source shall not cause or permit the construction, use, repair or demolition of a building, its appurtenances, a road, a driveway, or an open area without applying all reasonable measures to prevent particulate matter from becoming airborne and remaining visible beyond the property line. Such measures include, but are not limited to, paving or frequent cleaning of roads, driveways and parking lots; application of dust-free surfaces; application of water; and planting and maintenance of vegetative ground cover.
- (M) Testing:
 - (1) Performance testing if required by this permit or required by the DWEE shall be completed as follows:
 - (a) The source shall provide the DWEE with a written notice at least thirty (30) days prior to testing to afford the DWEE an opportunity to have an observer present. The DWEE may, in writing, approve a notice of less than 30 days. If the testing is pursuant to an underlying requirement contained in a federal rule, the notice provisions of the underlying requirement apply ((Title 129, Chapter 15, Section 005.03)*; Title 129, Chapter 15, Section 005.03).
 - (b) The notification required by Condition I.(M)(1)(a) shall include the following ((Title 129, Chapter 15, Section 005.03)*; Title 129, Chapter 15, Section 005.03):
 - (i) Facility Name, Address and FID number.

- (ii) Company Name, Address and Contact Person's name.
- (iii) Test schedule including the date and estimated start time of testing.
- (iv) List all applicable regulatory requirements that testing is being conducted for (permit condition, MACT, NSPS, etc.).
- (v) Types of pollutants to be sampled including applicable emission limits and demonstration requirements.
- (vi) Test methods and documentation of any proposed variations from the specified procedures and reason for variance.
- (c) Testing shall be conducted according to the methodologies found in Title 129, Chapter 15, Section 005.02*; Title 129, Chapter 15, Section 005.02, or other DWEE approved methodologies ((Title 129, Chapter 15, Section 005.02)*; Title 129, Chapter 15, Section 005.02).
- (d) Performance tests shall be performed under those representative (normal) conditions that: represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. ((Title 129, Chapter 15, Section 005)*; Title 129, Chapter 15, Section 005).
- (e) Performance tests shall be conducted for a minimum of three (3) one-hour runs unless another run-time is specified by the applicable Subpart or as deemed appropriate by the DWEE.
- (f) The source shall monitor and record the operating parameters for process and control equipment during the performance testing required in the permit.
- (g) A certified written copy of the test results, signed by the person conducting the test, shall be provided to the DWEE within sixty (60) days of completion of the test, unless a different time period is specified in the underlying requirements of an applicable federal rule, and will, at a minimum, contain the following items ((Title 129, Chapter 15, Section 005.02G)*; Title 129, Chapter 15, Section 005.02G):
 - (i) A description of:
 - 1. The operating parameters for the emissions unit during testing. Examples include, but are not limited to, production rates, process throughputs, firing rates of combustion equipment, or fuel usage; and,
 - 2. The operating parameters for the control equipment during testing. Examples include, but are not limited to, baghouse fan speeds, scrubber liquid flow rates, or pressure drop across the control device.
 - (ii) Copies of all data sheets from the test run(s).
 - (iii) A description and explanation of any erroneous data or unusual circumstance(s) and the cause for such situation.
 - (iv) A final conclusion section describing the outcome of the testing device.

II. GENERAL OPERATING PERMIT CONDITIONS

The following General Conditions apply to this permit unless otherwise provided for in the Specific Conditions of this permit. Terms and conditions of this permit are in accordance with the requirements of Title 129, Chapter 6, Section 003*; Title 129, Chapter 6, Section 003.

(A) Submittals/Reporting:

All submittals, including reports, required by Condition II.(A) and Condition I.(M)(1)(g) shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete ((Title 129, Chapter 1, Section 002.89*; Chapter 6, Sections 002.06* and 003.11*; Title 129, Chapter 1, Section 002.92; Chapter 6, Sections 002.06 and 003.11).

The source shall submit reports to the DWEE as follows:

- (1) The source shall submit a report of all instances of deviations from permit requirements including monitoring requirements stated in the permit every six (6) calendar months to the DWEE. The report for the first six (6) months (January through June) shall be submitted by September 30 of each year. The report for the second six (6) months (July through December) shall be submitted by March 31 of the following year ((Title 129, Chapter 6, Section 003.03B*; Title 129, Chapter 6, Section 003.03B).
- (2) The source shall report all deviations from permit requirements, including those attributable to start-ups, shutdowns or malfunctions, the probable cause of such deviations, and any corrective actions or preventive measures taken. The probable cause, corrective actions, or preventive measures do not have to be provided if that information has already been submitted in other reports to the DWEE, such as for 40 CFR 60.7; however reported deviations must reference these other reports. All reports of deviations must be submitted within the time frame as per Conditions II.(A)(2)(a), (b), and (c) below ((Title 129, Chapter 6, Sections 003.03B* and 003.03B4*; and Chapter 15, Sections 006.04* and 006.05*; Title 129, Chapter 6, Sections 003.03B and 003.03B4; and Chapter 15, Sections 006.04 and 006.05).
- (a) Any deviation resulting from emergency or upset conditions shall be reported within two (2) working days of the date on which the source first becomes aware of the deviation. The initial report may be submitted without a certification by the responsible official, as required by Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with the information required under Condition II.(A)(2) and any corrected or supplemental information required concerning the deviation.
- (b) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as is practicable. The report may be submitted initially without a certification by a responsible official in accordance with Condition II.(A) above, if an appropriate certification is provided within ten (10) days thereafter, together with any corrected or supplemental information required concerning the deviation.
- (c) All other deviations shall be reported as per Condition II.(A)(1).
- (3) The source shall submit completed emission inventories electronically utilizing the State and Local Emissions Inventory System (SLEIS) for the preceding calendar year to the DWEE by March 31 of each year ((Title 129, Chapter 11)*; Title 129, Chapter 11).
- (4) The source shall submit fees, due July 1 of each year, based on the actual emission tonnage, up to and including 4,000 tons per year for each regulated pollutant for fee purposes, as

- established in the emission inventory for the previous calendar year ((Title 129, Chapter 1, Section 002.88*; Chapter 6, Sections 003.07* and 009)*; Title 129, Chapter 1, Section 002.91; Chapter 6, Sections 003.07 and 008).
- (5) Certification of compliance with the terms and conditions of this permit, including emission limitations, standards, or work practices, for the preceding calendar year, shall be submitted to DWEE and to U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>) or by mail to Nebraska Air Compliance Coordinator, U.S. EPA, Region 7, ECAD/AB, 11201 Renner Boulevard, Lenexa, KS 66219 by March 31 each year. The report shall be certified by a responsible official in accordance with Condition II.(A) and shall include the following ((Title 129, Chapter 6, Section 003.11)*; Title 129, Chapter 6, Section 003.11).
- (a) The identification of each term or condition of the permit that is the basis of the certification.
- (b) The compliance status;
- (c) A determination of whether compliance was continuous or intermittent; and
- (d) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (6) Any emissions due to malfunctions, unplanned shutdowns, and ensuing start-ups that are, or may be in excess of applicable emission limitations shall be reported to the DWEE in accordance with Condition II.(A)(2)(a).
- (B) The source shall comply with 40 CFR Part 82, Protection of the Stratospheric Ozone. Affected controlled substances include, but are not limited to: chlorofluorocarbon (CFC) and hydrochlorofluorocarbon (HCFC) refrigerants, solvents and propellants, halons, carbon tetrachloride, and methyl chloroform (specific affected controlled substances are listed in 40 CFR Part 82, Subpart A, Appendices A, (Class I) and B (Class II)).
- The following subparts and Sections of 40 CFR Part 82 are conditions of this permit:
- Subpart A - Production and Consumption Controls
- Subpart B - Servicing of Motor Vehicle Air Conditioners
- Subpart E - Labeling of Products Using Ozone-Depleting Substances: Sections 82.106 Warning statement requirements, 82.108 Placement of warning statement, 82.110 Form of label bearing warning statement, and 82.112 Removal of label bearing warning statement.
- Subpart F - Recycling and Emissions Reduction: Sections 82.156 Required practices, 82.158 Standards for recycling and recovery equipment, 82.161 Technician certification, and 82.166 Reporting and recordkeeping requirements
- Subpart G - Significant New Alternatives Policy Program
- (C) This permit is issued for a fixed term of five (5) years. A timely renewal application is one that is submitted to the DWEE a minimum of six (6) months and a maximum of eighteen (18) months before permit expiration. Provided a timely and complete renewal application has been submitted, the conditions of this permit shall continue until the effective date of a new permit. ((Title 129, Chapter 6, Sections 002.01C* and 003.02)*; Title 129, Chapter 6, Sections 002.01C and 003.02).
- (D) The source shall comply with all conditions of this permit. Any permit noncompliance shall

constitute a violation of the Nebraska Environmental Protection Act and/or the Federal Clean Air Act, and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application ((Title 129, Chapter 6, Section 003.06A)*; Title 129, Chapter 6, Section 003.06A).

- (E) It shall not be a defense for the source in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit ((Title 129, Chapter 6, Section 003.06B)*; Title 129, Chapter 6, Section 003.06B).
- (F) This permit may be modified; revoked, reopened, and reissued; or terminated for cause in accordance with Title 129 and Title 115- Rules of Practice and Procedure. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not supersede any permit condition ((Title 129, Chapter 6, Section 003.06C)*; Title 129, Chapter 6, Section 003.06C).
- (G) Conditions under which this permit will be reopened, revoked and reissued or terminated during its term for cause, include but are not limited to ((Title 129, Chapter 6, Section 003.09*; Title 129, Chapter 9, Section 006)*; Title 129, Chapter 6, Section 003.09; Title 129, Chapter 9, Section 006):
- (1) Additional applicable requirements under the Nebraska Environmental Protection Act or the Federal Clean Air Act, which become applicable to this source with a remaining permit term of three (3) or more years. No such reopening will occur if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended;
 - (2) Additional requirements, including excess emissions requirements, that become applicable to an affected source under the acid rain program under Title 129, Chapter 5*; Title 129, Chapter 5.
- (H) This permit does not convey any property rights of any sort, or any exclusive privilege ((Title 129, Chapter 6, Section 003.06D)*; Title 129, Chapter 6, Section 003.06D).
- (I) The source shall furnish to the DWEE, within the time specified by the DWEE, any information requested by the DWEE in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the source shall also furnish to the DWEE copies of records required to be kept in accordance with the permit or, for information claimed to be confidential, the source may furnish such records along with a claim of confidentiality pursuant to Title 115 - Rules of Practice and Procedure ((Title 129, Chapter 6, Section 003.06E)*; Title 129, Chapter 6, Section 003.06E).
- (J) The provisions of this operating permit incorporate all applicable requirements contained in all previously issued active construction permits. Although the previously issued construction permits are still active, this operating permit will be the compliance and enforcement instrument for all applicable requirements incorporated into the operating permit (40 CFR 70.2 – Applicable Requirements (2)).
- (K) In the event of a challenge to any portions of this permit, the unchallenged permit requirements shall remain valid ((Title 129, Chapter 6, Section 003.05)*; Title 129, Chapter 6, Section 003.05).
- (L) Changes allowed without an operating permit revision ((Title 129, Chapter 9, Section 007)*; Title 129, Chapter 9, Section 007).
- (1) The source may make the changes identified in Condition II.(L)(1)(a) within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapter 12*; Chapter 13, Sections 001*, 002*, 003*, and 004*; Title 129, Chapter 12; Chapter 13,

- Sections 001, 002, 003 and 004; the change does not require a construction permit under Chapters 3* or 4*; Chapters 3 or 4; and the change does not result in the emissions allowable under the permit (whether expressed therein as a rate of emissions or in the terms of total emissions) being exceeded. The permit shield in Condition II.(M) shall not apply to any change made under this condition ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01).
- (a) Changes in the configuration of the facility's equipment, as defined in Section 502(b)(10) of the Act ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01). Written notification of these changes shall be sent to the DWEE and the administrator of EPA as follows:
- (i) Non-Emergencies ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01).
1. Written notification shall be received by the DWEE a minimum of seven (7) days in advance of the proposed changes;
- (ii) Emergencies ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01):
1. Initial notification shall be made within two (2) working days of the date on which the source first becomes aware of the need for the change;
 2. A follow-up written notification shall be submitted as soon as practicable; and,
 3. The notifications shall include an explanation of the nature of the emergency.
- (iii) Required information ((Title 129, Chapter 9, Section 007.01)*; Title 129, Chapter 9, Section 007.01):
1. A brief description of the change within the permitted source;
 2. The date on which the change will occur;
 3. Any change in emissions; and,
 4. Any permit term or condition that is no longer applicable as a result of the change.
- (iv) A copy of the notification shall be attached to the source's copy of the operating permit (40 CFR Part 70.4(b)(12)).
- (2) The source may make changes that are not defined as Section 502(b)(10) changes under the Act within a permitted facility without a permit revision if the change is not a modification under Title 129, Chapters 12* or 13*, Sections 001*, 002*, 003*, and 004*; Title 129, Chapters 12 or 13, Sections 001, 002, 003, and 004; and the change is not a change which would require a construction permit under Chapters 3* or 4*; Chapters 3 or 4 ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (a) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (b) The source shall provide contemporaneous written notice to the Director and the Administrator of EPA, except for changes that qualify as insignificant activities under the provisions of Title 129, Chapter 6, Sections 002.05C* and 002.05D*; Title 129, Chapter 6, Sections 002.05C and 002.05D. Such written notice shall include ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02):

- (i) A description of each change;
 - (ii) The date the change will be made;
 - (iii) A description of any change in emissions;
 - (iv) A list of the pollutants emitted; and,
 - (v) A list of any applicable requirements that would apply as a result of the change, including terms and conditions established in the relevant operating permit for synthetic minor purposes.
- (c) A copy of the notification in Condition II.(L)(2)(b) shall be attached to the source's copy of the operating permit.
- (d) Any change under Condition II.(L)(2) shall not qualify for a permit shield under Title 129, Chapter 6, Section 003.12*; Title 129, Chapter 6, Section 003.12 ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (e) The source shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and emissions resulting from those changes ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (f) Upon review of a notice submitted in accordance with Condition II.(L)(2)(b), the DWEE may require a source to apply for an operating permit if the change does not meet the requirements of Condition II.(L)(2) ((Title 129, Chapter 9, Section 007.02)*; Title 129, Chapter 9, Section 007.02).
- (3) Testing requirements:
- (a) Testing may be required if a change reported under Condition II.(L)(1) or II.(L)(2) involves an emissions unit that was previously tested ((Title 129, Chapter 6, Section 003.03*; Title Chapter 15, Section 005)*; Title 129, Chapter 6, Section 003.03; Title Chapter 15, Section 005).
- (M) A permit shield is granted ((Title 129, Chapter 6, Section 003.12)*; Title 129, Chapter 6, Section 003.12).
- (1) During the term of this permit compliance with Conditions I.(G), (H), (J), (L), and (M); Conditions II.(A), (B), (D) and (N); and Condition III constitutes compliance with all applicable requirements. The origin and/or authority for each applicable requirement are identified in the condition.
- (2) The permit shield does not affect:
- (a) The emergency provisions of Neb. Rev. Stat. §81-1507 of the Nebraska Environmental Protection Act;
 - (b) The USEPA's authority under the provisions of Section 303, Emergency Powers, of the Clean Air Act;
 - (c) Liability for any violation of applicable requirements or applicable requirements under the Federal Clean Air Act prior to or at the time of permit issuance;
 - (d) The applicable requirements of Chapter 5*; Chapter 5.
 - (e) The authority of the DWEE or USEPA to obtain information; or

- (f) Any other permit provisions, terms, or conditions, including, but not limited to, construction permits issued pursuant to Chapter 3*; Chapter 3 or permits issued pursuant to other State authorities and Titles.
- (3) The DWEE has determined that the requirements specifically identified in the following table are not applicable to this source. Therefore, a permit shield is granted as allowed under Title 129, Chapter 6, Section 003.12*; Title 129, Chapter 6, Section 003.12:

Requirement	Shield Request Basis and Determination
40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; Title 129, Chapter 12, Section <u>001.05</u> *; Title 129, Chapter 12, Section <u>001.06</u> Emission Units: EU-7A, EU-7C, EU-7D, 2 power washers in the truck shop, shower room boiler	Subpart Dc is not applicable to the emission units because all have a heat input capacity less than 2.9 megawatts (10 million British thermal units per hour or MMBtu/hr.), and the NSPS applies to steam generating units with a heat input capacity between 2.9 megawatts (10 MMBtu/hr.) and 29 megawatts (100 MMBtu/hr.).
40 CFR 60 Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978; Title 129, Chapter 12, Section <u>001.17</u> *; Title 129, Chapter 12, Section <u>001.18</u> Emission Units: Tanks #11, #12, #13, #14A, #15, #16, #17, #18	Subpart K is not applicable to the petroleum liquid storage tanks because each has a volume less than 40,000 gallons and each was not modified, reconstructed, or constructed within the applicable date range.
40 CFR 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984; Title 129, Chapter 12, Section <u>001.18</u> * Title 129, Chapter 12, Section <u>001.19</u> Emission Units: Tanks #11, #12, #13, #14A, #15, #16, #17, #18	Subpart Ka is not applicable to the petroleum liquid storage tanks because each has a volume less than 40,000 gallons and each was not modified, reconstructed or constructed within the applicable date range.
40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984; Title 129, Chapter 12, Section <u>001.19</u> *; Title 129, Chapter 12, Section <u>001.20</u> Emission Units: EU-T9, EU-T10, EU-T35, and Tanks #11, #12, #13, #14A, #15, #16, #17, #18	Subpart Kb is not applicable to petroleum liquid or paint storage tanks because each has a volume less than 75 cubic meters (19,815 gallons).

Requirement	Shield Request Basis and Determination
40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; Title 129, Chapter 12, Section <u>001.80</u> *; Title 129, Chapter 12, Section <u>001.81</u> Emission Units: EU-40 and EU-41	Subpart IIII is not an applicable requirement of the emergency generator engines because they are stationary spark ignition internal combustion engines rather than compression ignition internal combustion engines.
40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines; Title 129, Chapter 12, Section <u>001.81</u> *; Title 129, Chapter 12, Section <u>001.82</u> Emission Units: EU-40 and EU-41	Subpart JJJJ is not an applicable requirement of either emission unit. EU-40 was constructed in 1972, which is before the Subpart JJJJ applicability date of June 12, 2006, for commencement of construction. EU-41 was manufactured in November 2006 and constructed in July 2007 but is not subject to Subpart JJJJ because §60.4230(a)(4)(iv) states that emergency engines with a maximum engine power greater than 19 kW (25 hp) are subject to the NESHAP only if the engine was manufactured after January 1, 2009.
40 CFR 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks; Title 129, Chapter 13, Section <u>002.07</u> *; Title 129, Chapter 13, Section <u>002.08</u> Emission Units: Iron phosphating process	Subpart N applies to chromium electroplating or chromium anodizing tanks. Vulcraft conducts non-electrolytic plating that does not use chromium compounds in Deck Manufacturing; therefore, Subpart N Is not applicable.
40 CFR 63 Subpart Q, National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers; Title 129, Chapter 13, Section <u>002.09</u> *; Title 129, Chapter 13, Section <u>002.10</u> Emission Units: North and south cooling towers associated with the Joist plant	Subpart Q is not applicable because Vulcraft does not use chromium-based water treatment chemicals in the two cooling towers.
40 CFR 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning; Title 129, Chapter 13, Section <u>002.12</u> *; Title 129, Chapter 13, Section <u>002.13</u> Emission Units: Parts washers used in facility maintenance	Subpart T is not applicable. While the parts washers are considered batch cold cleaning machines by definition (§63.461), the halogenated HAP solvent content of the cleaning solution is less than 5 percent by weight. Vulcraft periodically tests the parts washer solutions to verify the halogenated HAP content over time is less than 5 percent.
40 CFR 63 Subpart VV, National Emission Standards for Oil-water Separators and Organic-water Separators; Title 129, Chapter 13, Section <u>002.35</u> *; Title 129, Chapter 13, Section <u>002.36</u> Emission Units: Oil water separators for Hotsy parts washers at the truck shop and joist maintenance shop, deck wastewater treatment plant, deck wash line cleaning tank	This NESHAP applies only when oil water separators are subject to another NSPS or NESHAP. Because none of the oil water separators at Vulcraft are subject to an NSPS or NESHAP, Subpart VV is not an applicable requirement.

Requirement	Shield Request Basis and Determination
40 CFR 63 Subpart EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (non-gasoline); Title 129, Chapter 13, Section <u>002.58</u> *; Title 129, Chapter 13, Section <u>002.59</u> Emission Units: Vulcraft/Cold Finish	Subpart EEEE is not applicable because Vulcraft/Cold Finish ^[1] became an area source of HAP before the compliance date of February 5, 2007, (existing sources) when the source requested and received HAP limits in Construction Permit #CP03-0024 issued to Vulcraft on 14 September 2005 and CP07-0054 issued to Cold Finish January 11, 2008.
40 CFR 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products; Title 129, Chapter 13, Section <u>002.65</u> *; Title 129, Chapter 13, Section <u>002.66</u> Emission Units: Vulcraft/Cold Finish	Subpart MMMM is not applicable because Vulcraft/Cold Finish ^[1] became an area source of HAP before the compliance date of January 2, 2007, (existing sources) when the source requested and received HAP limits in Construction Permit #CP22-044 issued to Vulcraft on February 13, 2023, and CP07-0054 issued to Cold Finish January 11, 2008.
40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Title 129, Chapter 13, Section <u>002.80</u> *; Title 129, Chapter 13, Section <u>002.81</u> Emission Units: Vulcraft/Cold Finish	Subpart DDDDD is not applicable because Vulcraft/Cold Finish ^[1] became an area source of HAP before the compliance date of January 31, 2016, when the source requested and received HAP limits in Construction Permit #CP22-044 issued to Vulcraft on February 13, 2023, and CP07-0054 issued to Cold Finish January 11, 2008.
40 CFR 63 Subpart GGGGG, National Emission Standards for Hazardous Air Pollutants: Site Remediation; Title 129, Chapter 13, Section <u>002.83</u> *; Title 129, Chapter 13, Section <u>002.84</u> Emission Unit: Vulcraft/Cold Finish	Subpart GGGGG is not applicable because Vulcraft/Cold Finish ^[1] became an area source of HAP before the compliance date of October 9, 2006, when the source requested and received HAP limits in Construction Permit #CP22-044 issued to Vulcraft on February 13, 2023, and CP07-0054 issued to Cold Finish January 11, 2008.
40 CFR 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; Title 129, Chapter 13, Section <u>002.100</u> *; Title 129, Chapter 13, Section <u>002.102</u> Emission Units: EU-24, EU-25	Subpart HHHHHH is not applicable because Vulcraft does not use paint strippers that contain methylene chloride and the paints do not contain any of the target HAP listed in §63.11169(c). Additionally, because Vulcraft is subject to NESHAP Subpart XXXXXX, it is not subject to the miscellaneous surface coating provisions of subpart HHHHHH per 40 CFR §63.11514(b)(4).
40 CFR 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources; Title 129, Chapter 13, Section <u>002.101</u> *; Title 129, Chapter 13, Section <u>002.103</u> Emission Unit: Shower room boiler	Subpart JJJJJ is not an applicable requirement because the shower room boiler combusts only natural gas. Therefore, the boiler is a gas-fired boiler and not subject as per §63.11195(e).

Requirement	Shield Request Basis and Determination
40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations; Title 129, Chapter 13, Section <u>002.112</u> *; Title 129, Chapter 13, Section <u>002.114</u> Emission Unit: iron phosphating tank	Subpart WWWW is not applicable. While non-electrolytic plating occurs in the iron phosphating tank, iron is deposited and none of the plating and polishing HAP listed in §63. 11504(a)(3) are deposited. Also, Vulcraft does not perform polishing.

^[1] See the permit history discussion in the associated fact sheet for an explanation of why hazardous air pollutant (HAP) emissions from Vulcraft (FID 35548) and Cold Finish (FID 84283) are considered together when determining area source status.

(4) The permit shield shall not apply to any temporary RICE or turbine replacement.

(N) When applicable, the source shall comply with the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions, Risk Management Plan (RMP), as part of the compliance certification submitted under Condition II.(A)(5). The source shall submit a certification statement that the source is in compliance with all requirements of Part 68, including the registration and submission of the RMP (40 CFR 68.215(a); Title 129, Chapter 6, Section 003.10*; Title 129, Chapter 6, Section 003.10).

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(A) Specific Conditions for Joists, Bridging, and Miscellaneous Metal Products Manufacturing.

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-018, received May 8, 2026, and CP22-044, issued February 13, 2023, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-1			
None	EU-1A: Thermal cutting, plasma and oxymethane torches; Maximum capacity: 1.66 million feet (MMft) of 1” equivalent plate cut. Process began 1964	None	None
	EU-1B: Thermal cutting plasma table; Maximum capacity: 5.037 MMft of ¾” of equivalent plate cut; Installed 2012		
	EU-1C: Thermal cutting, beam copers, and welders; Maximum capacity: 1.314 MMft of ¼” equivalent plate cut; Installed 2015		
	EP-1 Shear relocation and Rebar Bending Machine addition for RediCor line; Installed 2020		
Emission Point ID#: EP-2			
None	EU-2: Gas metal arc welding (GMAW), Portable Submerged Arc Welder; Maximum capacity: 16 lb. welding wire per ton of joist; Process began 1964	None	40 CFR 63 Subpart A; Title 129, Chapter 13, Subpart <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
			40 CFR 63 Subpart XXXXXX; Title 129, Chapter 13, Section <u>002.113</u> *; Title 129, Chapter 13, Section <u>002.115</u>

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-3			
None	EU-3: Painting with water-based paint in dip tanks (joist coating operation); Maximum capacity: 359,160 tons of joist painted per year; 2.2 gallons of paint per ton of joist; Process began in October 2025	None	None
Emission Point ID#: EP-20			
None	EU-20: Painting with solvent-based handheld aerosol cans, Maximum capacity: 359,160 tons of joist painted per year, 0.005 gallons paint per ton of joist, Process began 1964	None	None
Emission Point ID#: EP-25			
None	EU-25: Painting with hybrid water-based paint in a portable handheld sprayer, Maximum capacity: 1,095 tons of joists painted per year, 0.4 gallons of paint per ton of joists, Process began 1964	None	None
Emission Point ID#: EP-4			
None	EU-4: Painting with hybrid water-based paint in a dip tank, Maximum capacity: 1,796 tons bridging painted per year, 2.2 gallons paint per ton of bridging, Process began 1973	None	None
Emission Point ID#: EP-5			
CE-5: Airless Spray Box, 92% efficiency, installed January 2024	EU-5: Painting with water-based paint in an airless spray box, Maximum capacity: 12,130.75 tons bridging painted per year, 1.05 gallons paint per ton of bridging, Process began January 2024	None	None
Emission Point ID#: EP-21			
None	EU-21: Painting with solvent-based paint in handheld aerosol cans, Maximum capacity: 35,916 tons bridging painted per year, 0.005 gallons paint per ton of bridging, Process began 1973	None	None

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not

exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-1				
PM (Filterable)	42.75 lb./hr. ^{[1], [2],[3]}	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Emission Point ID#: EP-2				
Xylene	3.6 tons/yr.	Twelve (12) consecutive fiscal months	Construction Permit CP22-044 Cond. III.(C), issued February 13, 2023	No
Any HAP glycol ether (excluding EGBE)	5.0 tons/yr.			
Any other individual HAP	2.4 tons/yr.			
All combined HAPs	9.2 tons/yr.			
PM (Filterable)	43.62 lb./hr. ^{[1], [4]}	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Emission Point ID#: EP-5, EP-21				
PM (Filterable)	10.55 lb./hr. ^{[1], [5]} combined	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Emission Point ID#: EP-20, EP-25				
PM (Filterable)	21.67 lb./hr. ^{[1], [6]} combined	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Emission Point ID#: EP-1^[3], EP-2^[4], EP-3^[8], EP-4^[8], EP-5^[5],				
Opacity	< 20 Percent	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-3, EP-4, EP-20, EP-21, EP-25				
Opacity	< 20 Percent, each ^[8]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No

- [1] The process weight rate limitation in this table is based on the maximum design throughput of the emission unit. The process weight rate limit will vary with the actual throughput in accordance with Title 129, Chapter 15, Table 15-2*; Title 129, Chapter 15, Table 15-2.
- [2] The process weight rate limit is based on the sum of all process weight rates from EU-1A, EU-1B, and EU-1C that discharge to EP-1 as per Title 129, Chapter 15, Section 001.01*; Title 129, Chapter 15, Section 001.01.
- [3] Compliance with Condition I.(L) demonstrates compliance with the PM (filterable) and opacity limitations.
- [4] Compliance with Condition III.(A)(4)(d)(iv), (e)(vi) and (e)(vii) and (e)(viii) demonstrate compliance with the PM (filterable) and opacity limitations.
- [5] Compliance with Condition III.(A)(4)(b) demonstrates compliance with the PM (filterable) and opacity limitations.
- [6] Compliance with the process weight rate will occur because potential emission rates are less than the process weight rate limit. See the fact sheet discussion of Title 129, Chapter 15, Section 001.01*; Title 129, Chapter 15, Section 001.01 for more information.
- [7] Demonstrates compliance with the PM (filterable) and opacity limitations.
- [8] VOCs and HAP are not visible so compliance with the opacity limitation is expected.

(b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart XXXXXX for emission unit EU-2 [40 CFR 63 Subparts A and XXXXXX].

(i) The source is subject to the applicable emission limitations and testing requirements of 40 CFR §63.11516

(3) Operational and Monitoring Requirements:

(a) The source shall use water-based paints in the existing Joist and Miscellaneous Metal Products dip and spray (portable hand-held spray guns) painting operations (EU-3 and EU-25) and in the Bridging dip tank (EU-4) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(A); Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11].

Note: The construction permit required the source to replace solvent-based paints with water-based paints. The change in paint type was made as required, so the operating permit condition does not include the word “replace”. This difference is noted as required by Title 129, Chapter 6, Section 003.01*; Title 129, Chapter 6, Section 003.01.

(b) VOC emissions from the combined use of process paints and additives shall not exceed 240 tons per any period of twelve (12) consecutive fiscal months. At no time during the first eleven (11) fiscal months after the date of permit issuance shall the sum of emissions of VOC following the date of permit issuance exceed 240 tons. Compliance with the emission limit shall be determined as follows: [Construction Permit CP22-044, Condition XIII.(B), issued February 13, 2023]

(i) Emissions shall be calculated assuming that all VOCs in process paints and additives used are emitted. The process paints and additives shall be considered used if they are purchased and not returned or shipped off-site pursuant to the equation in Construction Permit#CP22-044 Condition XIII.(B)(3) issued February 13, 2023. Inventory on hand on the date of permit issuance shall be deemed purchased during the first fiscal month after the date of permit issuance. [Construction Permit CP22-044 Condition XIII.(B)(1) issued February 13, 2023]

(ii) Monthly VOC emissions shall be totaled to calculate emissions for any period of twelve (12) consecutive fiscal months. [Construction Permit CP22-044 Condition XIII.(B)(2) issued February 13, 2023]

(iii) Monthly emissions of VOC from the use of process paints and additives shall be calculated as follows [Construction Permit CP22-044 Condition XIII.(B)(3) issued February 13, 2023]:

1. Emissions of VOC for each fiscal month shall be calculated using the following equation:

$$E_{VOC} = \sum_{i=1}^m (W_{pi} * C_i) - \sum_{j=1}^n (W_{rj} * C_j)$$

Where: E_{VOC} = Total emissions (pounds/month) of VOC from process paints and additives used at the facility each fiscal month

i = Individual process paint or additive “i” with a SDS or chemical data sheet or group of process paints or additives “i” with a common SDS or chemical data sheet purchased during the fiscal month

j = Individual process paint or additive “j” with a SDS or chemical data sheet or group of process paints or additives “j” with a common SDS, chemical data sheet or testing data returned to vendor or shipped off-site during the fiscal month

m = Number of individual or groups of process paints or additives with separate SDS or chemical data sheets purchased during the fiscal month

n = Number of individual or groups of process paints or additives with separate SDS or chemical data sheets returned to vendor or shipped off-site during the fiscal month

W_{pi} = Weight (pounds) or volume (gallons) of VOC-containing process paint or additive “i” purchased by the facility each fiscal month

C_i = Concentration (pounds of VOC per gallon of product) or weight fraction (pounds of VOC per pound of product) of VOC in process paint or additive “i” purchased

W_{rj} = Weight (pounds) or volume (gallons) of VOC-containing process paint or additive “j” returned to the vendor or shipped off-site during the fiscal month

C_j = Concentration (pounds of VOC per gallon of product) or weight fraction (pounds of VOC per pound of product) of VOC in process paint or additive “j” returned to the vendor or shipped off-site

2. The VOC content and the density or specific gravity of the process paints and additives shall be obtained from the manufacturer and/or suppliers including SDS. If the data obtained gives a range for VOC content, the maximum value from the range shall be used when determining emissions. If the data obtained from a SDS or chemical data sheet representing a group of process paints or additives gives a range for the density, the lower of the maximum value from the range or 1.1 times the midpoint of the range shall be used when determining

emissions. If it is necessary to convert volume to weight, multiply the volume (gallons) of the process paint or additive used by the density (pounds/gallon) of the process paint or additive. If specific gravity is given, multiply the specific gravity by 8.34 pounds/gallon (the density of water) to obtain the density of the process paint or additive. [Construction Permit CP22-044 Condition XIII.(B)(3)(b) issued February 13, 2023]

- (c) HAP emissions from the use of process paints and additives and the Joist welding operations (EU 2) shall not exceed those specified in Condition III.(A)(2)(a) for emission point EP-2. At no time during the first eleven (11) fiscal months after the date of permit issuance shall the sum of emissions of HAP from all the previous months following the date of permit issuance exceed the emission limits. Compliance with the emission limits shall be determined as follows: [Construction Permit CP22-044, Condition XIII.(C), issued February 13, 2023]
- (i) Emissions shall be calculated by assuming that all volatile HAPs in process paints and additives used are emitted. The process paints and additives shall be considered used if they are purchased and not returned or shipped off-site pursuant to the equation in Condition III.(A)(2)(a). Inventory on hand on the date of permit issuance shall be deemed purchased during the first fiscal month after the date of permit issuance. [Construction Permit CP22-044 Condition XIII.(C)(1)]
- (ii) Monthly HAP emissions shall be totaled to calculate emissions for any period of twelve (12) consecutive fiscal months. [Construction Permit CP22-044 Condition XIII.(C)(2)]
- (iii) Monthly emissions of individual HAP from the use of process paints and additives shall be calculated as follows [Construction Permit CP22-044 Condition XIII.(C)(3)]:
1. Emissions of individual HAP for each fiscal month shall be calculated using the following equation:

$$E_{HAPi} = \sum_{j=1}^m (W_{pj} * C_{ij}) - \sum_{k=1}^n (W_{rk} * C_{ik})$$

Where: E_{HAPi} = Total emissions (pounds/month) of individual HAP “i” from process paints and additives used at the facility each fiscal month

i = HAP “i” emitted during the fiscal month

j = Individual process paint or additive “j” with a SDS or chemical data sheet or group of paints or other substances “j” with a common SDS or chemical data sheet containing HAP “i” purchased during the fiscal month

m = Number of individual or groups of process paints or additives with separate SDS or chemical data sheets containing HAP “i” purchased during the fiscal month

W_{pi} = Weight (pounds) of process paint or additive “j” containing HAP “i” purchased by the facility each fiscal month

C_{ij} = Weight fraction of individual HAP “i” in process paint or additive “j” (pounds HAP/pounds product)

k = Individual process paint or additive “k” with a SDS or chemical data sheet or group with a common SDS or chemical data sheet containing HAP “i” returned to vendor or shipped off-site during the fiscal month

n = Number of individual or groups of process paints or additives with separate SDS or chemical data sheets containing HAP “i” returned to vendor or shipped off-site during the fiscal month

W_{rk} = Weight (pounds) of process paint or additive “k” containing HAP “i” returned to vendor or shipped off-site during the fiscal month

C_{ik} = Weight fraction of individual HAP “i” in process paint or additive “k” (pounds HAP/pounds product)

2. The HAP content and the density or specific gravity of the process paints or additives shall be obtained from the manufacturer and/or suppliers, including SDS. If the data obtained gives a range for HAP content, the maximum value from the range shall be used when determining emissions. If the data obtained from a SDS or chemical data sheet representing a group of paints or additives gives a range for the density, the lower of the maximum value from the range or 1.1 times the midpoint of the range shall be used when determining emissions. If it is necessary to convert volume to weight, multiply the volume (gallons) of the process paint or additive used by the density (pounds/gallon) of the process paint or additive. If specific gravity is given, multiply the specific gravity by 8.34 pounds/gallon (the density of water) to obtain the density of the process paint or additive.

- (iv) Monthly HAP emissions from the Joist welding operations (EU 2) shall be calculated using the following equation [Construction Permit CP22-044 Condition XIII.(C)(4)]:

$$E_{WHAPi} = T_p * E_t * EF_i$$

Where: E_{WHAPi} = Total emissions (pounds/month) of individual HAP “i” from Joist welding operations each fiscal month

i = HAP “i” emitted during the fiscal month

T_p = Tons of joist welded during the fiscal month

E_t = Weight of electrode/wire used per ton of joist welded. A default value of 16 pounds/ton shall be used for E_t unless the Department approves an alternate value in writing.

EF_i = Emission factor for individual HAP "i" for the electrode/wire used during fiscal month (pounds HAP/1,000 pounds electrode consumed). If more than one type of electrode/wire (based on the American Welding Society Classification) is used for Joist welding operations during the fiscal month, the highest emission factor of individual HAP "i" shall be used.

- (v) Monthly total emissions of individual HAPs from the use of process paints and additives and the Joist welding operations for each fiscal month shall be calculated using the following equation [Construction Permit CP22-044 Condition XIII.(C)(5)]:

$$E_i = E_{HAPi} + E_{WHAPi}$$

where: E_i = Total emissions (pounds/month) of an individual HAP "i" from the use of process paints and additives and the Joist welding operations each fiscal month

E_{HAPi} = Total emissions (pounds/month) of an individual HAP "i" from process paints and additives used at the facility each fiscal month

E_{WHAPi} = Total emissions (pounds/month) of an individual HAP, "i" from the Joist welding operations each fiscal month

- (vi) Monthly emissions of combined HAPs from the use of process paints and additives and the Joist welding operations for each fiscal month shall be calculated using the following equation [Construction Permit CP22-044 Condition XIII.(C)(6)]:

$$E_{HAPT} = \sum_{i=1}^k E_i$$

where: E_{HAPT} = Total emissions (pounds/month) of combined HAP from the use of process paints and additives and Joist welding operations each fiscal month

k = Total number of individual HAP in process paints and additives and electrode/wire used during the fiscal month

E_i = Total emissions (pounds/month) of an individual HAP "i" from the use of process paints and additives and the Joist welding operations each fiscal month

- (d) PM/PM₁₀ emissions from EU-5 (Bridging airless spray box painting operation) shall be controlled by airless spraying inside an enclosed steel box. [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(D)].

- (e) The source shall comply with the requirements of 40 CFR 63 Subparts A and XXXXXX that are applicable to joists, bridging, and miscellaneous metal products manufacturing at EU-2 [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(J); 40 CFR 63 Subparts A and XXXXXX].

Note: This condition differs from that in the construction permit because it identifies the specific emission units subject to the NESHAP. The operating permit condition also does not cite every paragraph in the NESHAP as the construction permit condition does because only the applicable requirements of the NESHAP are included in the operating permit. These differences are noted as required by Title 129, Chapter 6, Section 003.01*; Title 129, Chapter 6, Section 003.01.

- (i) The source shall implement management practices to minimize emissions of metal fabrication and finishing hazardous air pollutants (MFHAP) as specified in Conditions III.(A)(3)(e)(i)1. and 2. for each dry machining operation that uses materials that contain MFHAP, as defined in §63.11522, or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP or when the equipment is otherwise exempt. [§63.11516(b); Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11].
1. The source shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 2. The source shall operate all equipment associated with dry machining according to manufacturer's instructions.
- (ii) The source shall comply with the requirements in Conditions III.(A)(3)(e)(ii)1. and 2. for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, or has the potential to emit MFHAP. If the welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the source shall demonstrate that management practices are being implemented by complying with the requirements in Conditions III.(A)(3)(e)(ii)3. through 8. The requirements in Conditions III.(A)(3)(e)(ii)1. through 8. do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP [§63.11516(f)].
1. The source shall operate all equipment associated with welding operations according to manufacturer's instructions [§63.11516(f)(1)].
 2. The source shall implement one or more of the management practices specified in Condition III.(A)(3)(e)(ii)2.A. through D. to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment [§63.11516(f)(2)].
 - A. Use welding processes with reduced fume generation capabilities (e.g. gas metal arc welding, or GMAW, also called metal inert gas welding or MIG);
 - B. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - C. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation; and

- D. 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.
- 3. Tier 1 compliance requirements for welding: the source shall perform visual determinations of welding fugitive emissions as specified in Condition III.(A)(3)(e)(iii) at the primary vent, stack, exit, or opening from the building containing the welding operations. The source shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Condition III.(A)(4)(d)(ii) [§63.11516(f)(3)].
- 4. Requirements upon initial detection of visible emissions from welding: If visible fugitive emissions are detected during any visual determination required in Condition III.(A)(3)(e)(ii)3., the source shall comply with the following requirements [§63.11516(f)(4)]:
 - A. 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 implemented in accordance with Condition III.(A)(3)(e)(ii)2. After completing such corrective actions, the source shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition III.(A)(3)(e)(iii)1. at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - B. 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 as required by Condition III.(A)(4)(e)(v).
- 5. Tier 2 requirements upon subsequent detection of visible emissions: If visible fugitive emissions are detected more than once during any consecutive twelve (12) month period (notwithstanding the results of any follow-up inspections), the source shall comply with the following requirements [§63.11516(f)(5)].
 - A. Within twenty-four (24) hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the source shall conduct a visual determination of the emissions opacity, as specified in Condition III.(A)(3)(e)(iii)3., at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - B. In lieu of the requirement of Condition III.(A)(3)(e)(ii)3. to perform visual determinations of fugitive emissions with USEPA Method 22, the source shall perform visual determinations of emissions opacity in accordance with Condition III.(A)(3)(e)(iii)4., using USEPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - C. The source shall keep a record of each visual determination of emissions opacity performed in accordance with Conditions III.(A)(3)(e)(ii)5.A. and B., along with any subsequent corrective action taken, in accordance with the requirements in Condition III.(A)(4)(d)(iii).
 - D. The source shall report the results of all visual determinations of emissions opacity performed in accordance with Conditions III.(A)(3)(e)(ii)5.A. and B., along with any subsequent corrective action taken, and submit with your

- annual certification and compliance report as required by Condition III.(A)(4)(e)(vi).
6. Requirements for opacities less than or equal to 20 percent but greater than zero: For each visual determination of emissions opacity performed in accordance with Conditions III.(A)(3)(e)(ii)5. for which the average of the six-minute average opacities recorded is twenty (20) percent or less but greater than zero, the source shall perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices implemented in accordance with Conditions III.(A)(3)(e)(ii)2. [§63.11516(f)(6)].
 7. Tier 3 requirements for opacities exceeding twenty (20) percent: For each visual determination of emissions opacity performed in accordance with Conditions III.(A)(3)(e)(ii)5. for which the average of the six-minute average opacities recorded exceeds twenty (20) percent, the source shall comply with the requirements in Conditions III.(A)(3)(e)(ii)7.A. through E. [§63.11516(f)(7)].
 - A. The source shall submit a report of exceedance of twenty (20) percent opacity, along with your annual certification and compliance report, as specified in Condition III.(A)(4)(e)(vii), and according to the requirements of Condition III.(A)(4)(e)(i).
 - B. Within thirty (30) days of the opacity exceedance, the source shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Condition III.(A)(3)(e)(ii)8. If the source has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this condition, the source shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within thirty (30) days.
 - C. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the source shall continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Condition III.(A)(3)(e)(iii)4., using USEPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - D. The source shall maintain records of daily visual determinations of emissions opacity performed in accordance with Conditions III.(A)(3)(e)(ii)7.C., during preparation of the Site-Specific Welding Emissions Management Plan in accordance with the requirements in Condition III.(A)(4)(e)(viii).
 - E. The source shall include these records in the annual certification and compliance report, according to the requirements of condition III.(A)(4)(e)(i).
 8. Site-Specific Welding Emissions Management Plan: If required, the Site-Specific Emissions Management Plan shall comply with the requirements in Conditions III.(A)(3)(e)(ii)8.A. through C. [§63.11516(f)(8)].
 - A. The Site-Specific Welding Emissions Management Plan shall contain the following information: company name and address; a list and description of all welding operations which currently comprise the welding affected source; a description of all management practices in place at the time of the opacity exceedance; a description of additional management practices to be implemented pursuant to Condition III.(A)(3)(e)(ii)7.B., and the projected

date of implementation; and any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries pursuant to this condition.

- B. The Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information as required by Conditions III.(A)(3)(e)(ii)8.A., and submitted with the annual certification and compliance report, according to the requirements of Condition III.(A)(4)(e)(i).
- C. The source shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in source records in a readily accessible location for inspector review, in accordance with the requirements in Condition III.(A)(4)(d)(v).

(iii) The source shall monitor visible emissions from welding (EU-2) as follows:

- 1. Visual determination of fugitive emissions, general: Visual determination of fugitive emissions shall be performed according to the procedures of USEPA Method 22, of 40 CFR part 60, Appendix A-7. The source shall conduct the USEPA Method 22 test while the affected source is operating under normal conditions. The duration of each USEPA Method 22 test shall be at least fifteen (15) minutes, and visible emissions will be considered to be present if they are detected for more than six (6) minutes of the fifteen (15) minute period [§63.11517(a)].
- 2. Visual determination of fugitive emissions, graduated schedule: Visual determinations of fugitive emissions shall be performed in accordance with Condition III.(A)(3)(e)(iii)2.A. through D. and according to the following schedule [§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.
 - B. Weekly Method 22 Testing: If no visible fugitive emissions are detected in consecutive daily USEPA Method 22 tests, performed in accordance with Condition III.(A)(3)(e)(iii)2.A. for ten (10) days of work day operation of the process, the source may decrease the frequency of USEPA Method 22 testing to once every five (5) days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the source shall resume USEPA Method 22 testing of that operation once per day during each day that the process is in operation in accordance with Condition III.(A)(3)(e)(iii)2.A.
 - C. Monthly Method 22 Testing: If no visible fugitive emissions are detected in four (4) consecutive weekly USEPA Method 22 tests performed in accordance with Condition III.(A)(3)(e)(iii)2.B., the source may decrease the frequency of the USEPA Method 22 testing to once per twenty-one (21) days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the source shall resume weekly USEPA Method 22 in accordance with Condition III.(A)(3)(e)(iii)2.B.
 - D. Quarterly Method 22 Testing: If no visible fugitive emissions are detected in three (3) consecutive monthly USEPA Method 22 tests performed in

accordance with Condition III.(A)(3)(e)(iii)2.C., the source may decrease the frequency of USEPA Method 22 testing to once per sixty (60) days of operation of the process (three calendar months). If visible fugitive emissions are detected during these tests, the source shall resume monthly USEPA Method 22 tests in accordance with Condition III.(A)(3)(e)(iii)2.C.

3. Visual determination of emissions opacity for welding Tier 2 or 3, general: Visual determination of emissions opacity shall be performed in accordance with the procedures of USEPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the USEPA Method 9 test shall be thirty (30) minutes [§63.11517(c)].
4. Visual Determination of emissions opacity for welding Tier 2 or 3, graduated schedule: The source shall perform visual determination of emissions opacity in accordance with Condition III.(A)(3)(e)(iii)3. and according to the schedule in the following conditions [§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.
 - 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 USEPA Method 9 tests performed in accordance with Condition III.(A)(3)(e)(iii)4.A. does not exceed twenty (20) percent for ten (10) days of operation of the process, the source may decrease the frequency of USEPA Method 9 testing to once per five (5) days of consecutive work day operation. If opacity greater than twenty (20) percent is detected during any of these tests, the source shall resume testing every day of operation of the process according to the requirements of Condition III.(A)(3)(e)(iii)4.A.
 - 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 USEPA Method 9 tests performed in accordance with Condition III.(A)(3)(e)(iii)4.B. does not exceed twenty (20) percent for four (4) consecutive weekly tests, the source may decrease the frequency of USEPA Method 9 testing to once per every twenty-one (21) days of operation of the process. If visible emissions opacity greater than twenty (20) percent is detected during any monthly test, the source shall resume testing every five (5) days of operation of the process according to the requirements of Condition III.(A)(3)(e)(iii)4.B.
 - 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 USEPA Method 9 tests performed in accordance with Condition III.(A)(3)(e)(iii)4.C does not exceed twenty (20) percent for three (3) consecutive monthly tests, the source may decrease the frequency of USEPA Method 9 testing to once per every one hundred twenty (120) days of operation of the process. If visible emissions opacity greater than twenty (20) percent is detected during any quarterly test, the source shall resume testing every twenty-one (21) days (month) of operation of the process according to the requirements of Condition III.(A)(3)(e)(iii)4.C.
 - E. Return to Method 22 testing for welding, Tier 2 or 3: If, after two (2) consecutive months of testing, the average of the six-minute opacities

recorded during any of the monthly USEPA Method 9 tests performed in accordance with Condition III.(A)(3)(e)(iii)4.C. does not exceed twenty (20) percent, the source may resume USEPA Method 22 testing as in Condition III.(A)(3)(e)(iii)2.C and 2.D. In lieu of this, the source may elect to continue performing USEPA Method 9 tests in accordance with Condition III.(A)(3)(e)(iii)4.C. and D.

(4) Recordkeeping and Reporting Requirements:

- (a) The source shall keep records of the dates of conversion to water-based paints to demonstrate compliance with Condition III.(A)(3)(a) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(1)].
- (b) Inspection and maintenance records for the airless spray box to show compliance with Condition III.(A)(3)(d) shall include the following [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(2)]:
 - (i) Records documenting when routine observations were conducted with a description, including operating parameters (e.g., pressure readings) and any atypical observations.
 - (ii) Records documenting when routine maintenance and preventive actions were conducted with a description of the maintenance and/or preventive action conducted.
 - (iii) Filter replacement records including filter position, type, and date of filter installation.
 - (iv) Records documenting equipment failures, malfunctions, or other variations, including time of occurrence, remedial action taken, and when corrections were made.
- (c) The source shall keep records regarding design, installation, operation, and maintenance per manufacturer's documentation as required in Condition III.(A)(3)(d) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(9)].
- (d) The source shall collect and keep notifications and records required by 40 CFR 63 Subparts A and XXXXXX for unit EU-2 to demonstrate compliance with Condition III.(A)(3)(e). The records shall be kept according to the requirements in Condition III.(A)(4)(d)(viii) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(11); §63.11519(c); 40 CFR 63 Subparts A and XXXXXX].
 - (i) General compliance and applicability records: The source shall maintain the information specified in Conditions III.(A)(4)(d)(i)1. and 2. for each affected source [§63.11519(c)(1)]:
 - 1. Each notification and report that the source submitted to comply with 40 CFR 63 Subpart XXXXXX and the documentation supporting each notification and report; and
 - 2. Records of the applicability determinations as in §63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for five (5) years and be made available for inspector review at any time.
 - (ii) Visual determination of fugitive emissions records: The source shall maintain a record of the information specified in Condition III.(A)(4)(d)(ii)1. through 3. for each affected source which performs visual determination of fugitive emissions in accordance with Condition III.(A)(3)(e)(iii)1. [§63.11519(c)(2)].

1. The date and results of every visual determination of fugitive emissions;
 2. A description of any corrective action taken subsequent to the test; and
 3. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (iii) Visual determination of emissions opacity records: The source shall maintain a record of the information specified in Condition III.(A)(4)(d)(iii)1. through 3. for each affected source which performs visual determination of emissions opacity in accordance with Condition III.(A)(3)(e)(iii)3. [§63.11519(c)(3)].
1. The date of every visual determination of emissions opacity;
 2. The average of the six-minute opacities measured by the test; and
 3. A description of any corrective action taken subsequent to the test.
- (iv) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan: The source shall 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 III.(A)(3)(e)(ii)7.C. [§63.11519(c)(11)].
- (v) Site-Specific Welding Emissions Management Plan: If the source is required to prepare a plan in accordance with Condition III.(A)(3)(e)(ii)7.C., the source shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in source records and the plan shall be readily available for inspector review [§63.11519(c)(12)].
- (vi) Manufacturer's instructions: If the source complies with 40 CFR 63 Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the source shall keep these instructions readily available for inspector review [§63.11519(c)(13)].
- (vii) Welding rod usage: If the source operates a new or existing welding affected source which is not required to comply with the requirements of Condition III.(A)(3)(e)(ii)3. through 8. because the welding affected source uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the source shall maintain records demonstrating welding rod usage on a rolling 12-month basis [§63.11519(c)(14)].
- (viii) Records shall be maintained according to the following requirements.
1. Records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), General Provisions. Where appropriate, the records may be maintained as electronic spreadsheets or as a database [§63.11519(c)(15)(i)].
 2. As specified in §63.10(b)(1), the source shall keep each record for five (5) years following the date of each occurrence, measurement, corrective action, report, or record except that the records shall be kept on-site for the entire five years as specified in Condition II.(A)(1) [§63.11519(c)(15)(ii)].
- Note: §63.10(b)(1) requires records to be kept on-site for two years while Condition II.(A)(1) requires records to be kept on-site for five years. The source shall comply with the more stringent operating permit requirement. This

difference between the operating permit and §63.10(b)(1) is noted as required in Title 129, Chapter 6, Section 003.01*; Title 129, Chapter 6, Section 003.01.

- (ix) The source is subject to the applicable recordkeeping and reporting requirements of 40 CFR §63.11519
- (e) The source shall comply with the reporting requirements in 40 CFR 63 Subparts A and XXXXXX [Title 129, Chapter 6, Section 003.03B*; Chapter 13, Sections 002.01* and 002.113*; Title 129, Chapter 6, Section 003.03B; Chapter 13, Sections 002.01 and 002.115].
- (i) The source shall prepare and submit annual certification and compliance reports for each affected source according to the requirements of Conditions III.(A)(4)(e)(ii) through (vii). The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the Federal Clean Air Act as specified in Condition III.(A)(4)(e)(iii) [§63.11519(b)(1)].
- (ii) Alternate Dates: Because the DWEE has established dates for submitting annual reports pursuant to §71.6(a)(3)(iii)(A), the source shall prepare or submit compliance reports according to the dates the DWEE has established in Condition I.(G)(1) [§63.11519(b)(3)(i)].
- (iii) Alternate Dates: If an affected source prepares or submits an annual certification and compliance report for 40 CFR 63 Subpart XXXXXX along with, or as part of, the monitoring report required by Condition I.(G), and the compliance report includes all required information concerning exceedances of any limitation in the 40 CFR 63 Subpart XXXXXX, its submission will be deemed to satisfy any obligation to report the same exceedances in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the DWEE [§63.11519(b)(3)(ii)].
- (iv) General requirements: The annual certification and compliance report shall contain the information specified in Conditions III.(A)(4)(e)(iv)1. through 3., and the information specified in Conditions III.(A)(4)(e)(v) and (vi) that is applicable to each affected source [§63.11519(b)(4)].
1. Company name and address;
 2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 3. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31.
- Note: The information reported for the twelve (12) months in the reporting period will be based on the last twelve (12) months of data prior to the date of each monthly calculation.
- (v) Visual determination of fugitive emission requirements: The annual certification and compliance report shall contain the information specified in Condition III.(A)(4)(e)(v)1. through 3. for each affected source which performs visual determination of fugitive emissions in accordance with Condition III.(A)(3)(e)(iii)1. [§63.11519(b)(5)].
1. The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;

2. A description of the corrective actions taken subsequent to the test; and
 3. The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- (vi) Visual determination of emissions opacity requirements: The annual certification and compliance report shall contain the information specified in Condition III.(A)(4)(e)(vi)1. through 3. for each affected source which performs visual determination of emissions opacity in accordance with Condition III.(A)(3)(e)(iii)3. [§63.11519(b)(6)].
1. The date of every visual determination of emissions opacity;
 2. The average of the six-minute opacities measured by the test; and
 3. A description of any corrective action taken subsequent to the test.
- (vii) Exceedances of twenty (20) percent opacity for welding affected sources: As required by Condition III.(A)(3)(e)(ii)7.A, the source shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds twenty (20) percent. This report shall be submitted along with the annual certification and compliance report according to the requirements in Condition III.(A)(4)(e)(i) and shall contain the information in Condition III.(A)(4)(e)(vii)1. and 2. [§63.11519(b)(8)].
1. The date on which the exceedance occurred; and
 2. The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (viii) Site-Specific Welding Emissions Management Plan reporting: The source shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition III.(A)(3)(e)(ii)7.D. and a copy of the Site Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to Condition III.(A)(3)(e)(ii)8. along with the annual certification and compliance report, according to the requirements in Condition III.(A)(4)(e)(i) [§63.11519(b)(9)].
- (ix) Visual determination of fugitive emissions records: The source shall maintain a record of the information specified in Condition III.(A)(4)(e)(ix)1. through 3. for each affected source which performs visual determination of fugitive emissions in accordance with Condition III.(A)(3)(e)(iii)2. and 4. [§63.11519(c)(2)].
1. The date and results of every visual determination of fugitive emissions;
 2. A description of any corrective action taken subsequent to the test; and
 3. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (x) Visual determination of emissions opacity records: The source shall maintain a record of the information specified in Condition III.(A)(4)(e)(x)1. through 3. for each affected source which performs visual determination of emissions opacity in accordance with Condition III.(A)(3)(e)(iii)2. and 4. [§63.11519(c)(3)].
1. The date of every visual determination of emissions opacity;
 2. The average of the six-minute opacities measured by the test; and
 3. A description of any corrective action taken subsequent to the test.

- (f) Records documenting HAP emissions from the use of process paints and additives and from the Joist welding operations to show compliance with Condition XIII.(A)(3)(c). The permittee shall keep appropriate records to support the emission calculations including, but not limited to, the quantity of all HAP-containing electrode/wire used and process paints and additives purchased, inventoried, returned or shipped off-site; SDS or equivalent information documenting the HAP content of the process paints and additives; and amount of joist welded [Construction Permit CP22-044 Condition XIII.(M)(3); Title 129, Chapter 13, Sections 002.01* and 002.113*; Title 129, Chapter 13, Sections 002.01 and 002.15].

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(B) Specific Conditions for Deck Manufacturing

(1) Permitted Emission Points

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-018, received May 8, 2026, and CP22-044, issued February 13, 2023, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-7A			
None	Deck – EU-7A, Alkaline cleaning tank heater, 8.0 MMBtu/hr. maximum heat input capacity, natural gas fired, installed December 2003	None	None
Emission Point ID#: EP-7C			
None	Deck – EU-7C, Phosphating tank heater, 3.6 MMBtu/hr. maximum heat input capacity, natural gas fired, installed 2000	None	None
Emission Point ID#: EP-7D			
None	Deck – EU-7D, Hot rinse tank heater, 3.6 MMBtu/hr. maximum heat input capacity, natural gas fired, installed January 1999	None	None
Emission Point ID#: EP-8			
None	Deck – EU-8, Painting with water-based paint in an automatic reverse roller, maximum capacity of 289,080 tons deck painted per year, 1.65 gallons paint per ton of deck, process began 1977	40 CFR 60 Subparts A; Title 129, Chapter 12, Section <u>001.01*</u> ; Title 129, Chapter 12, Section <u>001.01</u>	None
		40 CFR 60 Subpart TT; Title 129, Chapter 12, Section <u>001.48*</u> ; Title 129, Chapter 12, Section <u>001.49</u>	

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-22			
None	Deck – EU-22, Painting with solvent-based paint in hand-held aerosol cans, maximum capacity of 399,982 tons deck painted per year, 0.0005 gallons paint per ton of deck, process began 1977	None	None
Emission Point ID#: EP-24			
None	Deck – EU-24, Painting with water-based paint in a portable hand-held sprayer, capacity of 24,640 gallons, process began 1977	None	None
Emission Point ID#: EP-T9			
None	Deck – EU-T9, Water-based paint storage tank, maximum capacity 5,000 gallons, fixed roof, installed September 2000	None	None
Emission Point ID#: EP-T10			
None	Deck – EU-T10, Water-based paint storage tank, maximum capacity 5,000 gallons, fixed roof, September 2000	None	None
Emission Point ID#: EP-T35			
None	Deck – EU-T35, Water-based paint storage tank, maximum capacity 1,050 gallons, fixed roof, installed September 2002	None	None

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-7A				
PM (filterable)	4.8 lb./hr. ^[1]	1 hour	Title 129, Chapter 15, Section <u>001.02</u> *; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20% ^[1]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-7C, EP-7D				
PM (filterable)	2.16 lb./hr., each ^[1]	1 hour	Title 129, Chapter 15, Section <u>001.02</u> *; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20% ^[1]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-8				
VOC	0.28 kg/L of coating solids applied ^[2]	Fiscal month	Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(G); 40 CFR §60.462(a)(1)	No
Organic HAP	≤ 0.046 kg/L of solids applied ^[3]	12-fiscal-month compliance period	Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(H); 40 CFR §63.5120(a)	No
Opacity	< 20% ^[6]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-T9, EP-T10				
Opacity	< 20% ^[6]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-22, EP-24				
PM (filterable)	40.80 lb./hr. ^{[4],[5]} (Both units combined)	1 hour	Title 129, Chapter 15, Section <u>001.01</u> *; Title 129, Chapter 15, Section <u>001.01</u>	No
Opacity	< 20% ^[6]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-T35				
Opacity	< 20% ^[6]	6 minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] Demonstrates compliance with the PM (filterable) and opacity limitations. Compliance with Condition III.(B)(3)(b) demonstrates compliance with the VOC limit.

^[2] Compliance with Condition III.(B)(3)(b) demonstrates compliance with the VOC limit. Compliance with Condition III.(B)(3)(c) demonstrates compliance with the organic HAP limit.

^[3] Compliance with Condition III.(B)(3)(c) demonstrates compliance with the organic HAP limit.

- [4] The process weight rate limitation for spray painting (EP-22 and EP-24 combined) is based on the maximum amount of deck that can be manufactured. Compliance will occur because the amount of process paints and additives used at EU-24 is limited below potential maximum usage by Condition III.(B)(3)(d).
- [5] The process weight rate limitation in this table is based on the maximum design throughput of the emission unit. The process weight rate limit will vary with the actual throughput in accordance with Title 129, Chapter 15, Table 15-2*; Title 129, Chapter 15, Table 15-2.
- [6] Compliance with the opacity limitation is expected because VOCs and HAP are not visible.

(b) Because the source has chosen to control HAP from EU-8 by limiting HAP or volatile organic matter content of coatings, the source shall determine the HAP or volatile matter and solids content of coating materials according to the procedures in Condition III.(B)(2)(b)(i) and (ii) [Construction Permit #CP22-044 Condition XIII.(H). issued February 13, 2023].

- (i) The source shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures in Conditions III.(B)(2)(b)(i)1. through 4:
1. Method 311: The source may test the material in accordance with Method 311 of appendix A of 40 CFR Part 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the source. The organic HAP content shall be calculated according to the criteria and procedures in Conditions III.(B)(2)(b)(i)1.A. through C.
 - A. Count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds.
 - B. Express the weight fraction of each organic HAP the source counts according to Condition III.(B)(2)(b)(i)1.A. as a value truncated to four places after the decimal point (for example, 0.3791).
 - C. Calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763).
 2. Method 24: For coatings, the source may determine the total volatile matter content as weight fraction of non-aqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the source.
 3. Alternative method: The source may use an alternative test method for determining the organic HAP weight fraction once the USEPA Administrator has approved it. The permit shall follow the procedure in §63.7(f) to submit an alternative test method for approval.
 4. Formulation data: The source may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided to the source by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in Condition

III.(B)(2)(b)(i)1. through 3. and formulation data, the test data shall govern.

(ii) Solids content: The source shall determine the solids content of each coating material applied. The source may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see §63.14) or an USEPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the source. Alternatively, the source may rely on formulation data provided by material providers to determine the volume solids [Construction Permit #CP22-044, Condition XIII.(H) issued February 13, 2023].

(c) For the purpose of demonstrating continuous compliance with this provision, a compliance period consists of twelve (12) months. Each month is the end of a compliance period consisting of that month and the preceding eleven (11) months [Construction Permit #CP22-044 Condition XIII.(H), issued February 13, 2023].

(d) The source shall be in compliance with the standards in 40 CFR 63 Subpart SSSS that are in Condition III.(B)(2)(a) at all times, including periods of start-up, shutdown, and malfunction [Construction Permit #CP22-044 Condition XIII.(H), issued February 13, 2023].

(e) The source shall comply with all applicable emission limitations and testing requirements in NSPS Subpart TT for emission unit EU-8 [40 CFR 60 Subparts A and TT; Construction Permit CP22-044, Condition XIII.(G), issued February 13, 2023].

(i) The source is subject to the applicable emission limitations requirements of 40 CFR §60.462

(ii) The source is subject to the applicable testing requirements of 40 CFR §60.463

(f) Fuels combusted at the facility shall be limited as follows: [Title 129, Chapter 15]

(i) Natural gas and propane in the Deck Tank Heaters (EU-7A, EU-7C, and EU-7D), space heaters and emergency generator

(ii) Used oil generated on-site or on-specification used oil in the Truck Shop space heater

(3) Operational and Monitoring Requirements:

(a) The steel processed by the Deck Manufacturing Line (EU-8) shall not exceed 289,000 tons per any period of twelve (12) consecutive fiscal months. At no time during the first eleven (11) fiscal months after the date of permit issuance shall the sum of steel processed following the date of permit issuance exceed 289,000 tons [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(K)].

(b) The metal coil coating operations at the Deck Manufacturing line (EU-8) shall comply with the requirements of 40 CFR 60 Subparts A and TT [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(G); 40 CFR Part 60, Subpart TT].

Note: 40 CFR 60 Subpart TT refers to calendar months in its requirements. The source requested the use of fiscal months in a letter received by the DWEE on January 14, 2004, which is allowed by 40 CFR 63 Subpart SSSS (see the definition of month in §63.5110). The DWEE determined that use of fiscal months rather than calendar months is quantifiable, accountable, enforceable, and based on replicable procedures as required by Title 129, Chapter 6, Section 003.02*; Title 129, Chapter 6, Section 003.02, so fiscal months are used for all calculations requirements in this operating permit including those that apply to 40 CFR 60 Subpart TT. This difference between the NSPS and the operating

permit is noted as required by Title 129, Chapter 6, Section 003.02*; Title 129, Chapter 6, Section 003.02.

Note: Vulcraft may perform all calculations, recordkeeping, reporting, and fulfill any other requirement of this condition utilizing the English unit equivalent of any metric unit presented in this condition [Title 129, Chapter 6, Section 003.11*; Title 129, Chapter 6, Section 003.11].

- (i) The source shall use the following procedures for determining monthly weighted average emissions of VOCs in kilogram per liter of coating solids applied (kg/L of coating solids). The source shall use the following procedures for each affected source that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1) and Condition III.(B)(2)(a). The source shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The DWEE may require the source who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The source shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected source or serves both affected and existing sources, the source shall estimate the volume of coating used at each affected source by using the average dry weight of coating and the surface area coated by each affected and existing source or by other procedures acceptable to the DWEE [§60.463(c); §60.463(c)(1)].
- (ii) The source shall calculate the volume-weighted average of the total mass of VOCs consumed per unit volume of coating solids applied during each fiscal month for each affected source, except as provided under Condition III.(B)(3)(b)(iv). The weighted average of the total mass of VOCs used per unit volume of coating solids applied each fiscal month is determined by the following procedures [§60.461(b); §60.463(c)(1)(i)].
 1. The source shall calculate the mass of VOCs used ($M_o + M_d$) during each calendar month for each affected source by the following equation [§60.463(c)(1)(i)(A)]:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Note: $\sum L_{dj} D_{dj}$ will be zero (0) if no VOC solvent is added to the coatings, as received.

Where:

M_o = mass of VOCs in coatings consumed, as received (kilograms)

M_d = mass of VOC-solvent added to coatings (kilograms)

n = number of different coatings used during the fiscal month

L_c = volume of each coating consumed, as received (liters)

L_d = volume of each VOC-solvent added to coatings (liters)

W_o = proportion of VOCs in each coating, as received (fraction by weight)

- m = number of different VOC solvents added to coatings used during the fiscal month.
- L_d = volume of each VOC-solvent added to coatings (liters)
- D_d = density of each VOC-solvent added to coatings (kilograms per liter)
2. The source shall calculate the total volume of coating solids used (L_s) in each fiscal month for each affected source by the following equation [§60.461(b); §60.463(c)(1)(i)(B)]:

$$L_s = \sum_{i=1}^n V_{si} L_{ci}$$

Where:

- L_s = volume of coating solids consumed (liters)
- n = number of different coatings used during the calendar month.
- V_s = proportion of solids in each coating, as received (fraction by volume)
- L_c = volume of each coating consumed, as received (liters)
3. The source shall calculate the volume-weighted average mass of VOCs used per unit volume of coating solids applied (G) during the fiscal month for each affected source by the following equation [§60.463(c)(1)(i)(C)]:

$$G = \frac{M_o + M_d}{L_s}$$

- (iii) The source shall calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the fiscal month for each affected source by the following equation [§60.463(c)(1)(ii)]:
1. $N = G$
- (iv) Where the volume-weighted average mass of VOCs discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/L, the affected source is in compliance [§60.463(c)(1)(iii)].
- (v) If each individual coating used by an affected source has a VOC content, as received, that is equal or less than 0.28 kg/L of coating solids, the affected source is in compliance provided no VOCs are added to the coatings during distribution or application [§60.463(c)(1)(iv)].
- (vi) Where compliance with the numerical limit specified in Condition III.(B)(2)(a) is achieved through the use of low VOC-content coatings without the use of emission control devices, the source shall compute and record the average VOC content of coatings applied during each fiscal month for each affected source according to the equations provided in Conditions III.(B)(3)(b)(i) through (iii) [§60.464(a)].
- (c) The metal coil coating operations at the Deck Manufacturing Line (EU-8) shall comply with the applicable requirements of 40 CFR 63 Subparts A and SSSS [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(H)].
- (i) The source shall demonstrate compliance with the standard in Condition III.(B)(2)(a) by following the applicable procedures in Condition III.(B)(3)(c)(ii) [Construction Permit #CP22-044 issued February 13, 2023].

- (ii) The source shall include all coating materials (as defined in 40 CFR §63.5110) used in EU-8 when determining compliance with the applicable emission limit in Condition III.(B)(2)(a). To make this determination, the source shall use at least one of the four compliance options listed in Table 1 of 40 CFR §63.5170. The source may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire Deck Manufacturing Line. The source may use different compliance options for different coil coating lines, or at different times on the same line.

However, the source shall not use different compliance options at the same time on the same coil coating line. If the source switches between compliance options for any coil coating line or group of lines, the source shall document this switch as required by §63.5190(a), and the source shall report it in the next semiannual compliance report required in §63.5180. The source must also notify the DWEE, in writing, of a minimum of thirty (30) days prior to the change [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII(G)].

- (d) The paint used in the portable hand-held spray gun on the Deck Manufacturing Line (EU-24) shall comply with the following [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(L)]:

- (i) The amount of process paints and additives used in EU-24 shall not exceed 24,640 gallons per any period of twelve (12) consecutive fiscal months. The process paints and additives shall be considered used if they are purchased and not returned or shipped off-site.

- (ii) The paint used in EU-24 shall have a solids content equal to or less than seven (7) pounds per gallon.

- 1. The solids content value used to determine compliance with Condition III.(B)(3)(d)(ii) shall be obtained from the manufacturer and/or suppliers, including SDS. If the data obtained gives a range for solids content, the maximum value from the range shall be used when determining the solids content. If the data obtained from a SDS or chemical data sheet representing a group of paints gives a range for density, the lower of the maximum value from the range or 1.1 times the midpoint of the range shall be used when determining the pounds per gallon value. If specific gravity is given, multiply the specific gravity by 8.34 pounds per gallon (the density of water) to obtain the density of the paint. If a percent solids by weight value is given, the percent solids value will be multiplied by the density.

- (e) The source shall comply with all fuel type usage requirements for emission units Deck Tank Heaters (EU-7A, EU-7C, and EU-7D), space heaters and emergency generator as stated in Construction Permit #CP22-044 Cond. III.(E) issued February 13, 2023 [Title 129, Chapter 15*; Title 129, Chapter 15].

(4) Recordkeeping and Reporting Requirements:

- (a) The source shall keep records of the quantity of steel processed by the Deck Manufacturing Line (EU-8) to show compliance with Condition III.(B)(3)(a) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(12)].
- (b) The source shall keep records and submit reports required by 40 CFR 60 Subparts A and TT to demonstrate compliance with Condition III.(B)(3)(b) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(6)].

Note: This condition contains an NSPS reporting requirement in addition to the recordkeeping requirement from Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(6). Also, 40 CFR 60 Subpart TT refers to calendar months in its requirements. The source requested the use of fiscal months in a letter received by the DWEE on January 14, 2004, which is allowed by 40 CFR 63 Subpart SSSS (see the definition of month in §63.5110). The DWEE determined that use of fiscal months rather than calendar months is quantifiable, accountable, enforceable, and based on replicable procedures as required by Title 129, Chapter 6, Section 003.02*; Title 129, Chapter 6, Section 003.02, so fiscal months are used for all recordkeeping requirements in this operating permit including those that apply to 40 CFR 60 Subpart TT. This difference between the NSPS and the operating permit is noted as required by Title 129, Chapter 6, Section 003.01*; Title 129, Chapter 6, Section 003.01.

- (i) The source shall identify, record, and submit a written report to the DWEE every fiscal quarter of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition III.(B)(2)(a). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the DWEE semiannually [§60.465(c)].
- (ii) The source shall maintain at the source records of all data and calculations used to determine monthly VOC emissions from each affected source and to determine the monthly emissions limit, where applicable [§60.465(e)].

Note: §60.465(e) requires records to be kept for a period of at least two (2) years. However, Condition II.(A)(1) requires records to be kept on-site for five (5) years. The source must comply with the more stringent operating permit conditions. This difference in the NSPS and operating permit is noted as required by Title 129, Chapter 6, Section 003.01*; Title 129, Chapter 6, Section 003.01.

- (c) The source shall keep records as required by 40 CFR 63 Subparts A and SSSS applicable at the time of issuance of Construction Permit #CP22-044 issued February 13, 2023, to demonstrate compliance with Condition III.(B)(3)(c) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(7)].
 - (i) The source shall maintain the records specified in Condition III.(B)(4)(c) on-site for five (5) consecutive years [Construction Permit #CP22-044 issued February 13, 2023].
 - 1. The source shall keep records of the coating lines on which each compliance option was used and the time periods (beginning and ending dates and times) that each option was used [Construction Permit #CP22-044 issued February 13, 2023].
 - 2. The source shall keep organic HAP content data for the purposes of demonstrating compliance in accordance with Condition III.(B)(2)(b) [Construction Permit #CP22-044 issued February 13, 2023].
 - 3. The source shall keep volatile matter and solids content data for the purpose of demonstrating compliance in accordance with Condition III.(B)(2)(b) [Construction Permit #CP22-044 issued February 13, 2023].
 - 4. The source shall keep material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with Condition III.(B)(3)(c)(ii) [Construction Permit #CP22-044 issued February 13,

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- (d) The source shall keep appropriate records to show compliance with Condition III.(B)(3)(d) including, but not limited to, the quantity of all process paints and additives purchased for use in EU-24 and SDS or equivalent information documenting solids content of the process paints and additives used by EU-24 [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(13)].

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(C) Specific Conditions for Reciprocating Internal Combustion Engines

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-018, received May 8, 2026, and construction permit CP22-044, issued February 13, 2023, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-40			
None	EU-40, existing emergency lighting generator reciprocating internal combustion engine (RICE), 87 horsepower (hp), spark ignition, 4 cycle lean burn, 0.82 liters/cylinder, natural gas fired; installed 1972	None	40 CFR 63 Subparts A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u> 40 CFR 63 Subparts ZZZZ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>
Emission Point ID#: EP-41			
None	EU-41, emergency generator RICE, 114 hp, spark ignition, 4 cycle rich burn, 0.68 liters/cylinder, natural gas fired, model year 2006, installed July 2007	None	40 CFR 63 Subparts A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u> 40 CFR 63 Subparts ZZZZ; Title 129, Chapter 13, Section <u>002.78</u> *; Title 129, Chapter 13, Section <u>002.79</u>

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-40				
PM (Filterable)	0.13 lb./hr. ^[1]	Three 1-hour test runs or test method average	Title 129, Chapter 15, Section <u>001.02</u> *; Title 129, Chapter 15, Section <u>001.02</u>	No
SO _x	2.5 lb./MMBtu	2 hours	Title 129, Chapter 16, Section <u>001</u> *; Title 129, Chapter 16, Section <u>001</u>	No
Opacity	< 20 Percent ^[1]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No
Emission Point ID#: EP-41				
PM (Filterable)	0.17 lb./hr. ^[1]	Three 1-hour test method average	Title 129, Chapter 15, Section <u>001.02</u> *; Title 129, Chapter 15, Section <u>001.02</u>	No
Opacity	< 20 Percent ^[1]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] Compliance with Condition III.(C)(2)(a) demonstrates compliance with PM and Opacity limitations.

- (b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart ZZZZ for emission units EU-40 and EU-41 [40 CFR 63 Subparts A and ZZZZ; Title 129, Chapter 13, Sections 002.01* and 002.78*; Title 129, Chapter 13, Sections 002.01 and 002.79].

- (i) The source is subject to the applicable emission limitations and testing requirements of 40 CFR §63.6603

(3) Operational and Monitoring Requirements:

- (a) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart ZZZZ for emission units EU-40 and EU-41 [40 CFR 63 Subparts A and ZZZZ; Title 129, Chapter 13, Sections 002.01* and 002.78*; Title 129, Chapter 13, Sections 002.01 and 002.79].
- (i) For EU-40, the source shall comply with the operational and monitoring requirements in Table 2d to 40 CFR §63.6603(a)
- (ii) For EU-40, the source shall demonstrate continuous compliance with each operating limitation in Condition III.(C)(3)(a) according to methods specified in Table 6 of 40 CFR §63.6625(e)(3) and §63.6640(a)
- (b) The source shall install a non-resettable hour meter on EU-40 if one is not already installed [§63.6625(f)].

- (c) The source shall minimize EU-40's time spent at idle during startup and minimize EU-40's startup time to a period needed for appropriate and safe loading of the RICE, not to exceed thirty minutes [§63.6625(h)].
- (d) The source must operate EU-40 according to the requirements below [§63.6640(f)]:
 - (i) There is no time limit on the use of EU-40 in emergency situations [§63.6640(f)(1)].
 - (ii) The source may operate EU-40 for any combination of the purposes specified below for a maximum of 100 hours per calendar year [§63.6640(f)(2)]:
 1. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year [§63.6640(f)(2)(i)].
 2. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition III.(C)(3)(d)(ii)1. [§63.6640(f)(4)].
- (4) Recordkeeping and Reporting Requirements:
 - (a) For EU-40, the source shall keep:
 - (i) Records of the occurrence and duration of each malfunction of operation [§63.6655(a)(2); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.78*; Title 129, Chapter 6, Section 003.03; Chapter 13, Section 002.79];
 - (ii) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process equipment to its normal or usual manner of operation [§63.6655(a)(5); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.78*; Title 129, Chapter 6, Section 003.03; Chapter 13, Section 002.79];
 - (iii) Records required in Table 6 to 40 CFR 63 Subpart ZZZZ to show continuous compliance with each operating limitation that applies to EU-40 [§63.6655(d); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.78*; Title 129, Chapter 6, Section 003.03; Chapter 13, Section 002.79];
 - (iv) Records of the maintenance conducted on EU-40 in order to demonstrate that EU-40 was operated and maintained according to the source's own maintenance plan [§63.6655(e)(2); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.78*; Title 129, Chapter 6, Section 003.03; Chapter 13, Section 002.79]; and
 - (v) Records of the hours of operation of the RICE that are recorded through the non-resettable hour meter. The source must document how many hours are spent on emergency operations, including what classified the operation as emergency and how many hours are spent for non-emergency operation [§63.6655(f); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.78*; Title 129, Chapter 6, Section

003.03; Chapter 13, Section 002.79].

- (b) Records of fuels used in the process heaters, space heaters and emergency generator to show compliance with Construction Permit CP22-044 Condition XIII.(E) issued February 13, 2023.
- (c) The source shall comply with all applicable recordkeeping and reporting requirements in NESHAP Subpart ZZZZ for emission units EU-40 and EU-41 [40 CFR 63 Subparts A and ZZZZ].
 - (i) The source is subject to the applicable recordkeeping and reporting requirements of 40 CFR §63.6645 through §63.6660

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(D) Specific Conditions for Gasoline Storage Tanks

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-018, received May 8, 2026, and construction permit CP22-044 issued February 13, 2023, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-T13			
None	Tank #13; gasoline storage tank, 550-gallon maximum capacity	None	40 CFR 63 Subparts A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
			40 CFR 63 Subparts CCCCCC; Title 129, Chapter 13, Section <u>002.95</u> *; Title 129, Chapter 13, Section <u>002.97</u>
Emission Point ID#: EP-T15			
None	Tank #15, gasoline storage tank, 300-gallon maximum capacity	None	40 CFR 63 Subparts A; Title 129, Chapter 13, Section <u>002.01</u> *; Title 129, Chapter 13, Section <u>002.01</u>
			40 CFR 63 Subparts CCCCCC; Title 129, Chapter 13, Section <u>002.95</u> *; Title 129, Chapter 13, Section <u>002.97</u>

(2) Emission Limitations and Testing Requirements:

- (a) Pollutant emission rates from each emission point identified in the table below shall not exceed the permitted limits. Performance testing, if required, shall be conducted in accordance with Standard Condition I.(M).

Pollutant	Permitted Limit	Averaging Period	Basis for Permit Limit	Performance Testing Required
Emission Point ID#: EP-T13, EP-T15				
Opacity	< 20 Percent ^[1]	6 Minutes	Title 129, Chapter 15, Section <u>001.04</u> *; Title 129, Chapter 15, Section <u>001.04</u>	No

^[1] Compliance with the opacity limitation is expected because VOCs and HAP are not visible.

(b) The source shall comply with all applicable emission limitations and testing requirements in NESHAP Subpart CCCCCC for emission units EP-T13 and EP-T15 [Construction Permit #CP22-044, issued February 13, 2023, Condition XIII.(I); 40 CFR 63 Subparts A and CCCCCC; Title 129, Chapter 6, Section 003.03*; Chapter 13, Sections 002.01* and 002.95*; Title 129, Chapter 6, Section 003.03; Chapter 13, Sections 002.01 and 002.97].

(i) The source is subject to the applicable emission limitations and testing requirements of 40 CFR §63.11115 and §63.11116

(3) Operational and Monitoring Requirements:

(a) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart CCCCCC for emission units EP-T13 and EP-T15 [Construction Permit #CP22-044, issued February 13, 2023, Condition XIII.(I); 40 CFR 63 Subparts A and CCCCCC; Title 129, Chapter 6, Section 003.03*; Title 129, Chapter 13, Sections 002.01* and 002.95*; Title 129, Chapter 6, Section 003.03; Chapter 13, Sections 002.01 and 002.97].

(i) The source shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [§63.11116(a)]:

1. Minimize gasoline spills;
2. Clean up spills as expeditiously as practicable;
3. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
4. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(ii) Portable gasoline containers that meet the requirements of 40 CFR 59 Subpart F are considered acceptable for compliance with Condition III.(D)(3)(a)(i)3. [§63.11116(d); Title 129, Chapter 6, Section 003.03*; Chapter 13, Section 002.95*; Title 129, Chapter 6, Section 003.03; Chapter 13, Section 002.97].

(iii) The source is subject to the operational and monitoring requirements of 40 CFR §63.11115 and §63.11116

(4) Recordkeeping and Reporting Requirements:

(a) The source shall comply with all applicable operational and monitoring requirements in NESHAP Subpart CCCCCC for emission units EP-T13 and EP-T15 to demonstrate compliance with III.(D)(3)(a) [Construction Permit #CP22-044, issued February 13, 2023, Condition XIII.(M)(10); 40 CFR 63 Subparts A and CCCCCC; Title 129, Chapter 6, Section 003.03*; Chapter 13, Sections 002.01* and 002.95*; Title 129, Chapter 6, Section 003.03; Chapter 13, Sections 002.01 and 002.97].

(i) The source shall, upon request, demonstrate the monthly gasoline throughput of each tank is less than the 10,000-gallon threshold level. Records shall be kept for five (5) years [§63.11111(e)].

(ii) The source is not required to submit notifications or reports as specified in §63.11125, 63.11126 or 40 CFR 63 Subpart A, but the source shall have records available within twenty-four (24) hours of a request to document gasoline throughput [§63.11116(d)].

- (i) The source is subject to the applicable recordkeeping and reporting requirements of 40 CFR §63.11125, and §63.11126

III. SPECIFIC CONDITIONS FOR AFFECTED EMISSION POINTS:

(E) Specific Conditions for Haul Roads

(1) Permitted Emission Points:

- (a) The following table identifies emission points, emission units, permitted capacities, permitted fuel types, required control equipment the source must operate, and applicable standards at the source at the time of permit issuance, in accordance with operating permit application OP26R1-018, received May 8, 2026, and construction permit CP22-044 issued February 13, 2023, including any supporting information received prior to issuance of this permit:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements
Emission Point ID#: EP-15			
None	EU-15-1, Haul roads, paved, joist and bridging storage and joist, bridging, and deck shipment, total length of 2.2 miles	None	None
	EU-15-2, Haul roads, unpaved, joist storage, length of 0.1 miles		

(2) Emission Limitations and Testing Requirements:

At the time of permit issuance, no emission limitations or testing requirements are applicable requirements of the emission units listed in Condition III.(E)(1).

(3) Operational and Monitoring Requirements:

- (a) The source shall take all necessary measures to control particulate emissions from on-site haul roads with production-related traffic to comply with Condition I.(L), including but not limited to, watering, sweeping, applying chemical dust suppressants, and/or surface improvements [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(F)]
- (i) For each day of operation, the owner or operator shall conduct a survey of the plant property and haul roads to determine if visible fugitive emissions are being observed beyond the property line. Corrective action shall be taken upon observation of visible fugitive emissions. Documentation of all surveys and corrective actions shall be maintained in a log.

(4) Recordkeeping and Reporting Requirements:

- (a) The source shall keep records of daily visible fugitive emission surveys, control measures implemented, and corrective actions taken to show compliance with Condition III.(E)(3)(a) [Construction Permit #CP22-044 issued February 13, 2023, Condition XIII.(M)(5)].

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