
***MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT***

FOP Evaluation Document

**Preliminary Determination - Statement of Basis
for
Renewal of**

FOP Number: 44501112

For:

Northwest Pipe Company

Facility:

Northwest Pipe Company

Facility Address:

**12351 Rancho Road
Adelanto, CA 92301**

Document Date: **April 23, 2019**

Submittal date to EPA/CARB for review: **April 24, 2019**

EPA/CARB 45-day Commenting Period ends: **June 10, 2019**

Public Notice Posted: **April 29, 2019**

Public Commenting Period ends: **May 29, 2019**

Permit Issue date: **On or about June 17, 2019**

Permitting Engineer:

Chris Anderson

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

A. FACILITY IDENTIFYING INFORMATION:

Owner/Company Name: NORTHWEST PIPE COMPANY

Owner Mailing Address: NORTHWEST PIPE COMPANY
12351 Rancho Road
Adelanto, CA 92301

Facility Names: NORTHWEST PIPE COMPANY

Facility Location: 12351 Rancho Road
Adelanto, CA 92301

Mailing Address: NORTHWEST PIPE COMPANY
12351 Rancho Road
Adelanto, CA 92301

Federal Operating Permit Number: 044501112

MDAQMD Company Number: 0445

MDAQMD Facility Number: 01112

Responsible Official: Mr. Bruce Akana
Operations Manager
760-246-3191

Facility "Site" Contacts: Mr. Dan Madden
EHS Coordinator
760-246-2205
dmadden@nwpipe.com

Facility "Off Site" Contacts: Stephanie Heldt-Sheller
Corporate Environmental Specialist
503-382-2324

Nature of Business: Fabricated Pipe and Fittings

SIC/NAICS: 3317/331210

Facility Location: UTM (Km) 465E / 3824N

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The MDAQMD adopted Regulation XII [Rules 1200-1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40 CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility (Northwest Pipe Company (hereafter NWP) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*. NWP is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definition*, as this facility has a Potential to Emit (PTE) greater than the Major Facility thresholds for a volatile organic compounds (VOC) - an ozone precursor. NWP is an area source of hazardous air pollutants (HAPs) because it has the PTE less than 10 tons per year of a single HAP, and less than 25 tons per year of a combination of HAPs.

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit and determined that they are still valid and correct. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis*, pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the existing Title V Permit and explain the District's basis in composing the proposed Renewal.

In the MDAQMD, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. State and District only applicable requirements are designated as such.

The purpose of this action is to renew NWP's Federal Operating Permit.

1. Application and Setting

- a. The Mojave Desert Air Quality Management District (MDAQMD or District) received an application on December 6, 2018 to renew the current Title V Federal Operating Permit (FOP) for Northwest Pipe Company (NWP). The application was reviewed by the District and subsequently determined complete. Additional information for NWP Compliance Assurance Monitoring Plan was received in February 2019.

- b. NWP is located in the southwestern corner of the MDAQMD in the Federal Ozone Non-attainment Area (FONA) of the MDAQMD; this area of the MDAQMD is also non-attainment for PM10.
- c. There has been no significant emissions increase (as defined in District Rule 1301) at this facility since the issuance of the Title V permit.
- d. NWP does **not** have a PTE which would categorize the facility as a Federal Major Facility as defined in District Rule 1310.

C. DESCRIPTION OF FACILITY:

- a. NWP received its initial Title V permit on March 17, 2004. The current permit will expire on June 9, 2019.
- b. NWP Company is a Fabricated Pipe and Fittings facility and has an Standard Industrial Classification (SIC) Code: 3317 - Establishments primarily engaged in the production of welded or seamless steel pipe and tubes and heavy riveted steel pipe from purchased materials and a North American Industrial Classification System (NAICS) 331210 - This industry comprises establishments primarily engaged in manufacturing welded, riveted, or seamless pipe and tube from purchased iron or steel.
- c. Facility Process Description: Rolls of steel coil are spiral welded into lengths of large diameter pipe. This pipe is then coated with tar, tape, concrete, or polyurethane being applied to the inside diameter, outside diameter or both. Equipment specifically used or as support of the facility includes the following; Abrasive Blasting and Control Equipment, Plasma Arc Table, Steam Generator, and Coating Equipment (including Tape Wrap, Concrete Batching, Spray Equipment and Booths, Coal Tar System). Particulate Matter (PM, PM10, and PM2.5) and ozone precursor (NOx and VOC) emissions result from the processes and are predominantly controlled with baghouse or scrubber.

D. MODIFICATIONS TO FEDERAL OPERATING PERMIT #44501112:

1. Introduction

The legal and factual basis for changes to the permit follows. The permit parts (parts I through VI) are described below in the order presented in the permit. A reference to the origin and authority of each term and condition is contained in the FOP; the origin follows directly after the term, or condition, while the authority is listed in the Appendix B.

GENERAL UPDATES

- General formatting to improve the consistency of the MDAQMD Title V permit program.
- Update rule citations throughout the permit. Each rule citation was reformatted for program consistency which includes relocating the SIP citations to Part VII, Table 1.

Table 1 sufficiently identifies each rule, the SIP status of the rule and the federal enforceability of each rule.

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the NWP facility, including facility identifying information (section A) and a description of the facility and processes (section B).

Changes made to this section of the FOP:

- Part I, Section A; the facility address was updated by correcting facility location from Rancho *Street* to Rancho *Road*. Also the facility site contact was updated to reflect a change in NWP personnel.
- Part I, Section B; There were a couple of changes to the permitted equipment units on site, including removal of Pritec Pipe Coating System (District Permit B009002) and addition of one portable hand held spray gun (District Permit P012517).

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

- Part II.A.25 – Table 1 was updated to remove coating limits that have been superseded by more recently applicable requirements.
- Part II.A.27 – Table was reformatted- no substantive changes otherwise.
- Part II.A.37 thru 39 – These three sections pertaining to the applicable methods to be used to determine VOC content, the transfer efficiency of coating application equipment, and abatement control efficiency, from District Rules 1115 and 1114, are proposed for removal, as the facility does not formulate its own coatings but purchases pre-formulated coatings, uses industry standard coating application equipment compliant with transfer efficiency requirements, and does not use VOC control equipment in an effort to allow exceedance of coating limits in District Rule 1114 and 1115. For these reasons it is not necessary to provide these specific stipulations as applicable requirements in the permit.
- Part II.B.8 – The requirement to periodically submit an emissions inventory report was added. This requirement satisfies district, state, and federal emissions reporting requirements found in District Rule 107(b), H&S Code 39607 & 44341-44342, and 40 CFR 51, Subpart A. This requirement was located to this section of the permit, removed from individual equipment units from Part III.

- Part II.C.10 - Added facility-wide compliance requirements for GHGs pursuant to District Rule 1211.

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, compliance conditions, and compliance plans.

Changes made to this section of the FOP

General reformat of section including changing equipment description permit from number to letter format (ex// Part III.A.9.8 change to Part III.I.8)

- Part III.H.1 – corrected error noted as a typo in condition 1 stating “cold tar enamel” when in reality the material that is applied is “hot coal tar enamel”.
- Part III.I – update to equipment description, flow rate, and typographical corrections.
- Part III.I.8 – a citation to NSR Rule 1302 was added to indicate this condition is from new source review of this permit and this condition is a requirement to monitor hours operated to show compliance with Part III.I.7.
- Part III.J – update to equipment nozzle counts and flow rate or application equipment.
- Part III.L – Removed the phrase “This unit operates up to 20 hr/day” from the description as this is statement can misled one to believe this is an operating condition, which it has not been proven to be.
- Part III. - Pritec Pipe Coating System (District Permit B009002) requirements deleted from permit as this equipment is no longer at the facility. The removal of this process does not affect any facilitywide operating requirements or any source category/classifications made for this facility.
- Part III.S, T, V– Updates to reflect addition of CAM requirements.
- Part III.Z.7 – Updates to reflect District policy on source test timing and deadlines and submission and notification requirements.
- Part III.Z.9 – Consolidated the requirement for an emission inventory submission to Part II.B.8.
- Part III.AA.7 and 9 – Updates to reflect District policy on source test timing and deadlines and submission and notification requirements.
- Part III.BB. Citations added to indicated requirement derived from NEHAP for GDF and standardizing District and State only requirements to current District permit template.
- Part III.CC.3 - Updates to reflect District policy on source test timing and deadlines and submission and notification requirements.
- Part III.HH.5 – District Rule 20% opacity requirement has been superseded by State Law which allows 40% opacity from abrasive blasting operations. The 40% opacity requirement is a federally applicable requirement and can be found in Part III.A.34.9.
- Part III.II – equipment description update; Binks Mach 1 HVLP replaced by Graco Merkur X72 Airless Spray System.

- Part III.MM.2 – adjusted differential range from a max to a range.
- Part III.NN – updated equipment description consistent with equipment units on site. No emissions change.
- Part III.OO.6 – Based on passing results from past source test, the facility request that the annual test requirement be changed to triennial. Based on past performance, the District agrees to this request with the caveat that if there is a failing test, then the test frequency must return to annual testing.
- Part III.OO.1-11 – Conditions updated to reflect that the basis of each requirement is NSR and Rule 404.
- Part III.OO.8 - Consolidated the requirement for an emission inventory submission to Part II.B.8.
- Part III.PP – Addition of permit unit described as Dust Collector#2, Tape Wrap/Blast Clean Processing Line- MDAQMD Permit # C012589.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP:

- No changes were made to this section other than general format changes.

PART V: OPERATIONAL FLEXIBILITY

This section of the Federal Operating Permit contains information on Off Permit Changes.

Changes made to this section of the FOP:

- No changes were made to this section other than general format changes.

PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS, MDAQMD APPLICABLE SIP

This section of the Federal Operating Permit contains information on conventions, abbreviations, definitions and now includes a link to the table of MDAQMD SIP rules and regulations.

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules

E. RULE APPLICABILITY

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. NWP is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment per Part I, section B of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. NWP complies with all applicable regulations per Part II, section A.3 and A.4 of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. NWP complies with this regulation per Part II, section A.5 of their FOP.

Rule 207 – *Altering or Falsifying of Permit*. A person shall not willfully deface, alter, forge, or falsify any issued permit. NWP complies with this regulation per Part II, section A.6 of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. NWP shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. NWP complies with this regulation per Part II, section A.7 of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. NWP is in compliance with this rule per Part II, section A.8.

Rule 221 – *Federal Operating Permit Requirement*. NWP is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. NWP's annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. NWP has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.12.

Rule 431 – *Sulfur Content of Fuels*, This rule limits burning of gaseous fuel containing sulfur compounds in excess of 800 ppm calculated as hydrogen sulfide at standard conditions, or any liquid or solid fuel having a sulfur content in excess of 0.5 percent by weight. NWP is in compliance with this fuel using only PUC quality natural gas which is about 17 ppm and/or CARB ULSD which is about 0.015 percent by weight.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. NWP has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.14.

Rule 404 – *Particulate Matter Concentration*. NWP shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).

- (a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.
 - (b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
 - (c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
- NWP adheres to this rule per Part II, section A.15 of their FOP.

Rule 405 – *Solid Particulate Matter, Weight*. NWP shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

- (a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
 - (b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
- NWP adheres to this rule per Part II, section A.16 of their FOP.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. NWP meets this requirement by complying with operating condition listed in Part II, section A.17 of their FOP.

Rule 407 – *Liquid and Gaseous Air Contaminants*. This rule limits CO emissions from facilities. NWP meets this requirement by complying with operating condition listed in Part II, section A.18 of their FOP.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. NWP meets this requirement by complying with operating condition listed in Part II, section A.19 of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions averaged over a minimum of 25 consecutive minutes. NWP meets this requirement by complying with operating condition listed in Part II, section A.20 of their FOP. Note that NWP currently has no permitted combustion source.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. NWP

meets this requirement by complying with operating condition listed in Part II, section A.21 of their FOP.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. NWP meets this requirement by complying with operating condition listed in Part II, section A.22 of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Currently there are no NSPSs applicable to NWP.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. NWP meets this requirement by complying with operating condition listed in Part II, section A.23 of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. NWP meets the requirements of this rule by complying with operating condition listed in Part II, section A.24 of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. NWP meets the requirements of this rule by complying with operating condition listed in Part II, section A.25 thru A.35 of their FOP.

Regulation X – *National Emission Standards for Hazardous Air Pollutants*. Pursuant to Regulation X, NWP is required to comply with all applicable ATCMs.

Regulation XII – *Federal Operating Permits*. This regulation contains requirements for sources which must have a FOP. NWP currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions*. NWP is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. NWP complies with this rule per Part II, sections B and C, and Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to NWP's FOP does not constitute a modification; therefore, this rule is not subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to NWP's FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. NWP properly noticed their renewal pursuant to this rule.

Rule 1208 – *Certification*. NWP included a Certification of Responsible Official as required with the submitted application for the Renewal of Title V Permit.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. NWP is not a Major GHG Facility pursuant to Rule 1211 and has no requirements pertaining to this regulation.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. NWP is not a new facility nor is it currently a modified facility; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permit action does not trigger the applicability of Rule 1520.

Regulation XVI – *Prevention of Significant Deterioration*

Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. That said, NWP is not an existing source subject to PSD as NWP annual emission are less than the applicability thresholds.

Federal Regulations

40 CFR 63, Subpart A – *NESHAP General Provisions*. NWP is an area source of HAPs. Presently NWP is subject to 40 CFR 63 Subpart CCCCCC – Gasoline Dispensing Facilities. NWP complies with this regulation per Part III, Section A.28.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. “PSEU” means an emissions unit considered separately with respect to each regulated air pollutant.

The PSEU must:

- a. Be subject to an emission limitation or standard [40 CFR 64; AND,
- b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
- c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

NWP has two (2) PSEU which satisfy “a”, “b”, and “c” above (see table below). The proposed CAM Plan for each PSEU is found below. The key elements of CAM were already contained in the specific PSEU permits. It was however necessary to update each PSEU permit with citations indicating CAM requirements as well as add language to address daily monitoring requirements.

District Permits	Pollutant subject to Limitation or Standard	Major Source Threshold (tpy)	Pre-Control PTE greater than 100% of Major Source Threshold	Unit uses a control device	Exempt from CAM	CAM Plan Required
B003071 and B003072	PM	250	YES	YES	NO	YES

a. CAM Plan Development

This Compliance Assurance Monitoring (CAM) Plan was developed in accordance with 40 CFR Section 64.3 - Monitoring design criteria. Within these regulations, requirements for selecting monitoring parameters and establishing operating ranges are outlined. The plan was developed to include specified methods to determine compliance with an emission limitation on a continuous basis, consistent with the averaging period established for the emission unit in the operating permit. The plan addresses the operation of each water scrubber controlling PM from the Coal Tar Enamel System and each dust collector controlling PM from the Tape Wrap/Blast Clean Processing Line at the Northwest Pipe Company, Adelanto Facility.

The basis for selecting monitoring parameters and establishing operating ranges to ensure continued compliance are discussed in the sections below. Equipment description, performance indicators, operating ranges, and justification for each indicator are described.

b. Operational Description

NWP is primarily engaged in the production of welded or seamless steel pipe. Rolls of steel coil are spiral welded into lengths of large diameter pipe. This pipe is then coated with tar, tape, concrete, or polyurethane being applied to the inside diameter, outside diameter or both. Particulate Matter (PM, PM10, and PM2.5) emissions result from the mechanical abrading of the Tape Wrap/Blast Clean Processing Line as well as from the Coal Tar Enamel System and are controlled with baghouse or scrubber.

1. Coal Tar Enamel System

Emissions Unit Description:	Coal Tar Enamel System
Emissions Unit Identification:	Permit B003071
Emission Control Device(s):	C002655 Water Scrubber (“Small”) C007871 Water Scrubber
Regulated Pollutant:	PM10

Emission Limit: Process Rate not to exceed 4500 gal/day of heated coal tar enamel.

Monitoring Requirements in Permit: See District Permits C002655 and C007871
 Control Technology Description: Water Scrubber with Fogger Nozzles achieving 98% control of PM.

2. Tape Wrap/Blast Clean Processing Line

Emissions Unit Description: Tape Wrap/Blast Clean Processing Line

Emissions Unit Identification: Permit B003072

Emission Control Device(s): C003073 - Dust Collector #1, Tape Wrap/Blast Clean Processing Line
 C012589 - Dust Collector #2, Tape Wrap/Blast Clean Processing Line

Regulated Pollutant: PM10

Emission Limit: B003072 - PM10 = 4380 operating hours
 C003073 and C012589 – PM10 = Each dust collector shall not emit greater than 0.51 pounds per hour of PM10 at a maximum concentration of 0.01 grains/dscf

Monitoring Requirements in Permit: See District Permits C002655 and C007871

Control Technology Description: Water Scrubber with Fogger Nozzles achieving 98% control of PM and Dust Collector achieving 99% control for PM10.

c. Main Elements of the CAM Plan

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 1 and Table 2:

Table 1

Permit Unit	B003071
Monitoring Methods and Location	(1) Pressure gauge (or equivalent) and water flow meter. Pressure gauge installed at inlet and outlet ducts and water flow meter installed at inlet water line to scrubber. Proper operation of pressure gauge and water flow meter.

Indicator Range	Pressure differential and water flow rate within permit limits. The permittee may adjust the indicator ranges pursuant to 40 CFR 64.7 (e) with District approval.
Data Collection Frequency	(1) Daily pressure and flow recordings when the unit is in operation.
Averaging Period	Not applicable
Recordkeeping	(1) The permittee shall maintain records of each pressure differential recording and each water flow meter measurement (2) The permittee shall maintain records of any corrective action taken and of all control equipment inspections and maintenance.
Excursions/Corrective Actions	An excursion shall be defined as (1) any pressure differential recording outside of the prescribed range, (2) any flow meter measurement outside the prescribed range. The permittee shall initiate an inspection and take corrective action for each excursion.
QA/QC	Personnel responsible for recording daily pressure and flow rate parameters shall be familiar with the equipment. All gauges shall be calibrated in accordance with manufacturer's specifications. Inspections shall be performed by trained personnel familiar with the operation of the scrubber system.

Table 2

Permit Unit	B003072
Monitoring Methods and Location	(1) hour timer (B003072) (2) pressure differential recordings (C003073 & C012589) (3) visible emissions. Inspection of control equipment, including the filter system and perform routine maintenance in accordance with a written maintenance schedule. Inspections shall involve taking the system offline (while the emission unit is not in operation), and inspecting the dust collector cartridge and cleaning systems.
Indicator Range	(1) pressure differential within permit limits (2) any visible emissions. The permittee may adjust the indicator ranges pursuant to 40 CFR 64.7 (e) with District approval.
Data Collection Frequency	(1) Daily pressure differential recordings when the unit is in operation by trained personnel (2) monthly visual observations when the unit is in operation by trained personnel and shall last at least six (6) minutes. The results of the observations shall be recorded in a log; (3) Quarterly cartridge and cartridge suspension system inspection with date and results. The results of the inspection observations shall be recorded in a log;
Averaging Period	Not applicable
Recordkeeping	(1) The permittee shall maintain records of each pressure differential recording, each visual observation, and each control equipment inspection. (2) The permittee shall maintain records of any corrective action taken and of all equipment maintenance.

Excursions/Corrective Actions	An excursion shall be defined as, (1) any pressure differential recording outside of the prescribed range, (2) if a required quarterly inspection is not completed, (3) if the quarterly inspection reveals the need for non-routine maintenance, or (4) any visible emissions. The permittee shall initiate an investigation and take corrective action for each excursion.
QA/QC	The hour timer and pressure differential device shall be calibrated in accordance with manufacturer's suggested schedule. Personnel responsible for conducting visual observations shall receive training at least twice per year. The monthly inspections shall be performed by trained personnel familiar with the operation of each air pollution control device.

d. Rationale for selection of performance indicators

Several parameters can be used as indicators of wet scrubber and dust collector performance. For the wet scrubber PM control, the primary indicators of wet scrubber performance are pressure differential and scrubber liquid flow rate. For the dust collector performance indicators are pressure differential at the inlet and outlet of the filter system and visible emissions.

e. Rationale for selection of indicator range

Baseline information on the relationship among process operating conditions, control device operating conditions, and emissions was necessary to establish the indicators and ranges. Under normal operation the wet scrubber pressure differential and flow rate shall remain within permit limits and the dust collector pressure differential shall remain within permit limits and there should be no visible emissions observed.

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of NWP Federal Operating Permit. The District has determined that the renewal permit is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein. The proposed permit and corresponding statement of legal and factual basis will be publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix A of this document.

G. PUBLIC COMMENT AND NOTIFICATIONS

1. Public Comment

This preliminary determination will be publicly noticed in accordance with District Rule 1207. Please see Appendix A of this document for noticing details.

2. Notifications

This preliminary determination will be submitted to USEPA pursuant to District Rule 1205 for a forty-five (45) day review period and similarly to CARB pursuant to District Rule 1207

for a thirty (30) day comment period.

Director, Office of Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

APPENDIX A

Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a):

- Scheduled to be published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on TBD
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A).
- Posted on the MDAQMD Website at the following link:
<http://mdaqmd.ca.gov/permitting/federal-operating-permits/current-title-v-permits>

NOTICE OF TITLE V PERMIT RENEWAL

NOTICE IS HEREBY GIVEN THAT *Northwest Pipe Company*, located within the Mojave Desert Air Quality Management District (MDAQMD) at 12351 Rancho Street, Adelanto, has applied for the renewal of their current Federal Operating Permit (FOP#44501112) pursuant to the provisions of MDAQMD Regulation XII. The applicant is a company engaged in steel pipe fabrication. Applicant is required to obtain the renewal of the FOP because the facility triggers the applicability threshold for Title V / FOP in the ozone non-attainment area of the MDAQMD.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed Title V Permit Renewal. If you submit written comments, you may also request a public hearing on the proposed issuance of the Title V Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on May 29, 2019, or thirty days after the publication date of this notice (whichever is later) to the MDAQMD, Attention: Chris Anderson at the address listed below.

RIGHT TO PETITION USEPA FOR RECONSIDERATION: The proposed Title V Permit is also subject to review and approval by USEPA. If USEPA has not objected to a proposed permit action and the District has not addressed a public comment in a satisfactory manner, the public may also petition the Administrator of USEPA at 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460, within 60 days after the end of the 45-day USEPA review period, to reconsider the decision to not object to the permit action.

AVAILABILITY OF DOCUMENTS: The Proposed Federal Operating Permit as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. Please contact Chris Anderson, Air Quality Engineer, at the above address or (760) 245-1661, x 1846 or at canderson@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661 x1846