State of Utah

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Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-AN109540002-24

November 25, 2024

Sterling Jensen
Richards Sheet Metal
2680 Industrial Drive
Ogden, UT 84401
sjensen@richards-fab.com

Dear Mr. Jensen:

Re: Approval Order: Administrative Amendment to Approval Order DAQE-0251-93 for a 10-Year Review and Permit Updates
Project Number: N109540002

The attached Approval Order (AO) is issued pursuant to the Division of Air Quality conducting a 10-year administrative review of this source and its respective AO. Richards Sheet Metal must comply with the requirements of this AO, all applicable state requirements (R307), and Federal Standards.

The project engineer for this action is **Lucia Mason**, who can be contacted at (385) 707-7669 or lbmason@utah.gov. Future correspondence on this AO should include the engineer's name as well as the DAQE number shown on the upper right-hand corner of this letter.

Sincerely,

Bryce C. Bird
Director

BCB:LM:jg

cc: Weber-Morgan Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

APPROVAL ORDER
DAQE-AN109540002-24
Administrative Amendment to Approval Order DAQE-0251-93 for a 10-Year Review and Permit Updates

Prepared By
Lucia Mason, Engineer
(385) 707-7669
lbmason@utah.gov

Issued to
Richards Sheet Metal - Steel Parts Manufacturing Facility

Issued On
November 25, 2024

Issued By

Bryce C. Bird
Director
Division of Air Quality

TABLE OF CONTENTS

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Richards Sheet Metal

Source Name
Richards Sheet Metal - Steel Parts Manufacturing Facility

Mailing Address
2680 Industrial Drive
Ogden, UT 84401

Physical Address
2680 Industrial Drive
Ogden, UT 84401

Source Contact
Name: Sterling Jensen
Phone: (801) 436-1419
Email: sjensen@richards-fab.com

UTM Coordinates
415,138 m Easting
4,563,315 m Northing
Datum NAD83
UTM Zone 12

SIC code 3444 (Sheet Metal Work)

SOURCE INFORMATION

General Description
Richards Sheet Metal manufactures sheet metal and steel parts in Ogden, Weber County. The facility consists of three (3) production buildings and an administration office. The primary emission unit at the facility is a paint booth. The paint booth is located on the east side of the building and is vented through an uncontrolled stack.

NSR Classification
10-Year Review

Source Classification
Located in Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA
Weber County
Airs Source Size: B

Applicable Federal Standards
None

Project Description
This administrative amendment is to AO DAQE-0251-93, dated April 12, 1993. The DAQ is conducting a 10-year review of the source and is updating the language and format of the 1993 AO. There are no changes to the operations taking place at the steel parts manufacturing facility.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
Carbon Monoxide		0.05
Nitrogen Oxides		0.21
Particulate Matter - PM_{10}		1.47
Particulate Matter - $PM_{2.5}$		1.47
Volatile Organic Compounds		7.54

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Chromium Compounds (CAS #CMJ500)		88
Cobalt Compounds (CAS #CNB850)		1
Lead (CAS #7439921)		7
Methanol (CAS #67561)		2021
Toluene (CAS #108883)		4041
Xylenes (Isomers And Mixture) (CAS #1330207)		1078
	Change (TPY)	**Total (TPY)**
Total HAPs		3.62

SECTION I: GENERAL PROVISIONS

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]

I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

SECTION II: PERMITTED EQUIPMENT

II.A THE APPROVED EQUIPMENT

II.A.1	**Richards Sheet Metal** Steel Parts Manufacturing Facility
II.A.2	**Spray Painting Booth** One (1) Paint Booth Dimensions: 44' long x 14' wide x 20' high

SECTION II: SPECIAL PROVISIONS

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Site-Wide Requirements**
II.B.1.a	The owner/operator shall post a copy of this AO on site. The owner/operator shall make the AO available to employees who operate the air emission-producing equipment, and the owner/operator shall provide these employees with instructions as to their responsibilities operating the equipment in compliance with the relevant conditions listed below. [R307-401-8]
II.B.1.b	The owner/operator shall not consume more than the following: A. 2,000 gallons of paint per rolling 12-month period B. 1,200 gallons of paint thinner per rolling 12-month period. [R307-401-8]
II.B.1.b.1	The owner/operator shall: A. Determine consumption using invoice records of paints and thinners purchased B. Record consumption on a daily basis C. Use consumption records to calculate a rolling 12-month total based on the first day of each month using records from the previous 12 months D. Keep consumption records for all periods when the plant is in operation. [R307-401-8]
II.B.1.c	The owner/operator shall not allow visible emissions from any point or fugitive emission source associated with the installation of control facilities to exceed 10% opacity on site. [R307-401-8]

II.B.1.c.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. Visible emissions from mobile sources and intermittent sources shall use procedures similar to Method 9, but the requirements for observations to be made at 15-second intervals over a six-minute period shall not apply. Any time interval with no visible emissions shall not be included. [R307-401-8]
II.B.2	**Fuel Requirements**
II.B.2.a	The owner/operator shall only use natural gas as fuel in the plant heating/cooling system. [R307-401-8]
II.B.3	**Paint Booth Requirements**
II.B.3.a	The owner/operator shall equip the paint booth with: A. Twenty-four (24) 20" x 25" x 2" intake filters B. Twenty-four (24) 20" x 25" x 2" exhaust paint arrestor filters C. One (1) exhaust fan rated to 14,000 Actual Cubic Feet Per Minute (ACFM) D. One (1) vent, 30" in diameter, which shall extend no less than 8' above the building roof and shall vent vertically into the atmosphere. [R307-401-8]
II.B.3.b	The owner/operator shall equip the spray booth with Research Product Corporation paint arrestor particulate pads (stock no. 3031), or equivalent, to control particulate emissions. All exhaust air from the spray booth shall be routed through the arrestor particulate pads, or equivalent, before being vented to the atmosphere. [R307-401-8]
II.B.4	**VOC Requirements**
II.B.4.a	The owner/operator shall not emit more than 7.54 tons per rolling 12-month period of VOCs from evaporative sources (paints and thinners) on site. [R307-401-8]
II.B.4.a.1	The owner/operator shall calculate a new 12-month total by the 1st day of each month using data from the previous 12 months. The owner/operator shall use a mass balance method to calculate emissions from evaporative sources. The owner/operator may use the following equations with applicable units to comply with the mass-balance method: VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed] [R307-401-8]
II.B.4.a.2	The owner/operator shall keep a record each month for all times the plant is in operation containing the following: A. The name of the VOC-emitting material (paint, thinner, reducers, etc.) B. The percent by weight of VOCs in each material used C. The density of each material used D. The volume of each VOC-emitting material used daily E. The amount of VOCs emitted from each material. [R307-401-8]

II.B.4.b	The owner/operator shall comply with all applicable requirements of UAC R307-350. Miscellaneous Metal Parts and Products Coatings. [R307-350]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes AO DAQE-0251-93 dated April 12, 1993

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds