State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN108030002-25

February 12, 2025

Tim Sexton
Utah Pacific Bridge & Steel
50 North Geneva Road
Lindon, UT 84042
Tim@utahpacificbridge.com

Dear Mr. Sexton:

Re: Intent to Approve: New Steel Fabrication Facility
Project Number: N108030002

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Katie Andersen,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Katie Andersen, can be reached at (385) 515-1748 or kandersen@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:KA:jg

cc: Utah County Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN108030002-25
New Steel Fabrication Facility

Prepared By
Katie Andersen, Engineer
(385) 515-1748
kandersen@utah.gov

Issued to
Utah Pacific Bridge & Steel - Utah Pacific Steel

Issued On
February 12, 2025

New Source Review Section Manager
Alan D. Humpherys

TABLE OF CONTENTS

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Utah Pacific Bridge & Steel

Source Name
Utah Pacific Bridge & Steel - Utah Pacific Steel

Mailing Address
50 North Geneva Road
Lindon, UT 84042

Physical Address
50 North Geneva Road
Lindon, UT 84042

Source Contact
Name: Tim Sexton
Phone: (801) 785-3557
Email: Tim@utahpacificbridge.com

UTM Coordinates
437,081 m Easting
4,465,658 m Northing
Datum NAD83
UTM Zone 12

SIC code 3441 (Fabricated Structural Metal)

SOURCE INFORMATION

General Description
Utah Pacific Bridge & Steel (UPBS) is located in Lindon, Utah County. UPBS fabricates steel bridge girders from plate steel and wide flange beams. The plate steel is received on-site by rail, where front-end loaders, forklifts, and cranes are used to move the steel during the fabrication process. The plate steel is formed into girders via plasma or oxy-fuel cutting, welding, and sanding. Primers and finish paint coats are applied as specified by the client. The final products are shipped off-site by truck.

NSR Classification
New Minor Source

Source Classification
Located in Southern Wasatch Front O3 NAA, Provo UT $PM_{2.5}$ NAA
Utah County
Airs Source Size: B

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
MACT (Part 63), A: General Provisions
MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
MACT (Part 63), XXXXXX: National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Project Description
UPBS applied for a Small Source Exemption, but in the process of calculating the emission estimates, discovered that they do not qualify for a Small Source Exemption. As they do not have a permit, UPBS is applying for an Approval Order.

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)
CO_2 Equivalent		16.00
Carbon Monoxide		0.09
Nitrogen Oxides		4.10
Particulate Matter - PM_{10}		4.65
Particulate Matter - $PM_{2.5}$		4.17
Sulfur Dioxide		0.00
Volatile Organic Compounds		9.05

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Ethyl Benzene (CAS #100414)		202
Manganese (TSP) (CAS #7439965)		12
Metal HAPs (CAS #MHAPS)		0
Methanol (CAS #67561)		24
Methyl Isobutyl Ketone (Hexone) (CAS #108101)		120
Naphthalene (CAS #91203)		4
Toluene (CAS #108883)		6920
Xylenes (Isomers And Mixture) (CAS #1330207)		640
	Change (TPY)	**Total (TPY)**
Total HAPs		3.96

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in The Daily Herald on February 14, 2025. During the public comment period, the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

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

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	**Utah Pacific Bridge & Steel**
II.A.2	**One (1) Blasting Unit (Pre-Weld Blasting)** Media: Sand Control: Fully Enclosed, vents to Dust Collector
II.A.3	**Various Plasma Cutters** Control: None

II.A.4	**Various Hand, Robotic, and Sub Arc Welders**
II.A.5	**Blasting Operations (Blast/Paint Shed)** System: Blasting System and two (2) hand blasting guns Media: Steel Grit and Steel Shot Control: Enclosed, vents through ducting to the ground outside
II.A.6	**Painting Operations** Location: Blast/Paint Shed System: Paint tank system and two (2) airless spray guns in operation Control: Enclosed Location: Paint Shed System: Various airless spray guns Control: Enclosed
II.A.7	**Emergency Generator Engine** Fuel: Diesel Manufacture Date: June 7, 2006 Rating 275 HP (205.3 kW) NSPS Applicability: Subpart IIII MACT Applicability: Subpart ZZZZ

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Dry Abrasive Blasting Operations Requirements**
II.B.1.a	The owner/operator shall only use abrasive blasting media that meets the definition of low dust abrasives with a free silica content of less than 1.0%. [R307-401-8]
II.B.1.a.1	The owner/operator shall maintain records of abrasive blasting media used on site. The records shall contain: A. The name of abrasive blasting media B. The free silica content within the blasting media. [R307-401-8]
II.B.1.b	The owner/operator shall not consume more than 76,860 pounds of abrasive blasting media total per rolling 12-month period for all abrasive blasting operations combined. [R307-401-8]

II.B.1.b.1	To determine compliance with a rolling 12-month total, the owner/operator shall: A. Record the quantity of abrasive media added to each blasting unit when the abrasive media is added B. Record the date when the abrasive media is added to each blasting unit B. Calculate a new 12-month total by the 20th day of each month using data from the previous 12 months C. Keep records of abrasive media used for all periods when the plant is in operation. [R307-401-8]
II.B.1.c	The owner/operator shall comply with all applicable requirements in R307-306: PM_{10} Nonattainment and Maintenance Areas: Abrasive Blasting for abrasive blasting operations. [R307-306]
II.B.1.d	The owner/operator shall route all emissions from the Blasting Unit (Equipment ID II.A.2) to a working dust collector. [R307-401-8]
II.B.1.e	The owner/operator shall install a manometer or magnehelic pressure gauge to measure the static pressure drop across the dust collector. [R307-401-8]
II.B.1.e.1	The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. [R307-401-8]
II.B.1.e.2	The pressure gauge shall measure the pressure drop in 1-inch water column increments or less. [R307-401-8]
II.B.1.f	During operation of the dust collector, the owner/operator shall maintain the static pressure drop within the range recommended by the manufacturer for normal operations. [R307-401-8]
II.B.1.f.1	The owner/operator shall record the pressure drop at least once per operating week while the baghouse is operating. [R307-401-8]
II.B.1.f.2	The owner/operator shall maintain the following records of the pressure drop readings: A. Unit identification; B. Manufacturer recommended static pressure drop for the unit; C. Date of reading; D. Daily static pressure drop readings. [R307-401-8]
II.B.1.g	At least once every 12 months, the owner/operator shall calibrate the pressure gauges in accordance with the manufacturer's instructions or replace the gauges. [R307-401-8]
II.B.1.g.1	The owner/operator shall maintain records of the pressure gauge calibrations and replacements. [R307-401-8]
II.B.1.h	The owner/operator shall not allow visible emissions from the dust collector to exceed 10% opacity. [R307-401-8]

II.B.1.h.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.2	**VOC & HAP Requirements**
II.B.2.a	The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site: 9.02 tons per rolling 12-month period of VOCs 4.02 pounds per rolling 12-month period of naphthalene 23.70 pounds per rolling 12-month period of methanol 128.19 pounds per rolling 12-month period of MIBK 201.21 pounds per rolling 12-month period of ethylbenzene 643.73 pounds per rolling 12-month period of xylene 3.46 tons per rolling 12-month period of toluene 3.97 tons per rolling 12-month period of all HAPs combined. [R307-401-8]
II.B.2.a.1	The owner/operator shall calculate a new 12-month total by the 20th 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] HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed] The volume consumed of each evaporative source may be determined by purchase orders. [R307-401-8]
II.B.2.a.2	The owner/operator shall use a mass-balance method to quantify any amount of VOCs and HAPs reclaimed. The owner/operator shall subtract the amount of VOCs and HAPs reclaimed from the quantities calculated above to provide the monthly total emissions of VOCs and HAPs. [R307-401-8]

II.B.2.a.3	The owner/operator shall keep records each month of the following: A. The name (as per SDS) of the VOC- and HAP-emitting material B. The maximum percent by weight of VOCs and each HAP in each material used C. The density of each material used D. The volume of each VOC- and HAP-emitting material used and/or the volume purchased in the last month E. The amount of VOCs and the amount of each HAP emitted from each material F. The amount of VOCs and the amount of each HAP reclaimed and/or controlled from each material G. The total amount of VOCs, the total amount of each HAP, and the total amount of all HAPs combined emitted from all materials (in tons). [R307-401-8]
II.B.2.b	The owner/operator shall comply with the applicable VOC content limit requirements as listed in R307-350-5. [R307-350-5, R307-401-8]
II.B.3	**Haul Roads and Fugitive Dust Source Requirements**
II.B.3.a	The owner/operator shall not allow visible emissions from haul roads and all other fugitive dust sources to exceed 20% opacity on site and 10% opacity at the property boundary unless otherwise specified in this permit. [R307-309-5]
II.B.3.a.1	Visible emission determinations for fugitive dust from haul roads and operational areas shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than 1/2 vehicle length behind the vehicle and not less than 1/2 the height of the vehicle. [R307-309-5]
II.B.3.a.2	Opacity requirements for fugitive dust shall not apply when the wind speed exceeds 25 miles per hour if the owner/operator has implemented, and continues to implement, the accepted FDCP and administers at least one (1) of the following contingency measures: A. Pre-event watering B. Hourly watering C. Additional chemical stabilization, or D. Cease or reduce fugitive dust producing operations E. Other contingency measure approved by the Director. [R307-309-5]
II.B.3.b	The owner/operator shall use water application or other control options contained in R307-309 to minimize emissions from fugitive dust and fugitive emissions sources, including haul roads. Controls shall be applied to ensure the opacity limits in this AO are not exceeded. [R307-309-5, R307-401-8]

II.B.3.b.1	The owner/operator shall keep and maintain records of water application for all periods when the plant is in operation. The records shall include the following items: A. Date and time treatments were made B. Number of treatments made. [R307-309-5, R307-401-8]
II.B.3.c	Within 30 days of the date of this AO, the owner/operator shall submit a FDCP in electronic or written format. An electronic FDCP can be completed through the Utah DEQ Fugitive Dust Plan Permit Application Website. If a written FDCP is completed, it shall be submitted to the Director, attention: Compliance Branch, for approval. The owner/operator shall comply with the FDCP for control of all fugitive dust sources associated with the source. [R307-309-6]
II.B.4	**Emergency Generator Engine Requirements**
II.B.4.a	The owner/operator shall not operate the emergency generator engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engine during emergencies. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.a.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of the emergency generator engine shall be kept in a log and shall include the following: A. The date the emergency generator engine was used B. The duration of operation in hours C. The reason for the emergency generator engine usage. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.a.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for the emergency generator engine. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.b	The owner/operator shall only use diesel fuel (e.g., fuel oil #1, #2, or diesel fuel oil additives) as fuel in the emergency generator engine. [R307-401-8]
II.B.4.b.1	The owner/operator shall only combust diesel fuel that meets the definition of ultra-low sulfur diesel (ULSD), which has a sulfur content of 15 ppm or less. [R307-401-8]
II.B.4.b.2	To demonstrate compliance with the ULSD fuel requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements. [R307-401-8]

PERMIT HISTORY

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

Is Derived From	NOI dated August 14, 2024
Incorporates	Additional Information dated September 24, 2024
Incorporates	Additional Information dated October 9, 2024

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