

DRAFT

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

MEMORANDUM

October 20, 2026

TO: Lee Warden, P.E., Chief Engineer

THROUGH: Richard Kienlen, P.E., Engineering Manager, New Source Permits Section

THROUGH: Alexandria Mills, P.E., Engineering Permits Section

FROM: Jennie Doan, E.I., Engineering Section, ROAT

SUBJECT: Evaluation of Permit Application No. **2018-0199-O (M-2)**
SteelFab Texas, Inc.
SteelFab Texas (SIC 3441/NAICS 332312)
Facility ID: 18809
Latitude: 33.96843°, Longitude: -96.36557°
Section 9, Township 7S, Range 9E; Bryan County, Oklahoma
Directions: 446 Country Club Road, Durant, Oklahoma 74701

SECTION I. INTRODUCTION

SteelFab Texas, Inc. (SteelFab or the applicant) has applied for a modification of the individual minor source operating permit for their SteelFab Texas facility to operate the new Peddinghaus plasma-cutting unit (EU #ES-09) and its associated dust collector (CD-5) authorized in Construction Permit No. 2018-0199-C (M-2), issued on April 22, 2025. Facility started operating these units on May 1st, 2025. The facility currently operates under Permit No. 2018-0199-O (M-1), issued on May 27, 2025.

Based on operations at this facility, facility-wide controlled emissions are estimated to be 36.27 TPY of NO_x, 1.65 TPY of CO, 20.53 TPY of VOC, 64.41 TPY of PM₁₀, and 36.71TPY of HAPs, worst case. However, SteelFab requests facility-wide cap limits of 99.90 TPY for NO_x, VOC and PM₁₀ and 9.90 TPY/24.90 TPY for single/aggregated HAPs to remain below major source levels. This facility, therefore, qualifies for a “synthetic minor” permit because the facility has taken emission limits to stay below the major source threshold of 100 TPY for any regulated pollutant, 10 TPY for a single HAP and 25 TPY for any combination of HAPs.

SECTION II. PROCESS DESCRIPTION

The SteelFab Texas facility is a structural metal fabrication facility consisting of two buildings for structural steel fabrication processes with outside material work and storage yards for raw steel. Operations involve cutting, welding, cleaning, and coating of large structural steel components of mild steel. The facility does not process any alloys or non-ferrous metals.

The process begins by feeding raw steel plate through one of the plasma machines for processing. Though welding may occur at any time during the process, it is typically performed after transforming steel components in the plasma machines. If required, shot blasting typically occurs before steel components are painted. Not all structural components are coated. When coating is required, the type is based on customer specifications and requirements. Lastly, the components are assembled by bolting or welding into shipping units. The finished products are then staged in the outside storage yard until pickup/project completion.

Hand tool cleaning and power tool cleaning of materials are also conducted at the facility. However, mill scale, rust, and paint will not be removed by these processes, resulting in negligible emissions from these operations. The power tools used in cleaning operations are handheld machinery such as hand grinders, die grinders, etc.

ES-01, ES-02, ES-08, & ES-09: Plate Processing (Plasma Cutting) – Plate processing functions include drilling, marking, and cutting to transform the raw steel plate into usable components. There are two plasma cutting machines (ES-01 and ES-02) at the facility, each with an interlocked Torit dust collection and filtration system. There is a robotic plasma cutter (ES-08) with an inherent Lincoln Electric Prism Dust collection and filtration system.

The new plasma cutter (ES-09) has an inherent Torit Dust collection and filtration system. Per machine emissions have been estimated by multiplying the Hypertherm, Inc. emission rates for specific carbon steel constituents by the dust collection and filtration efficiency to obtain the emission rate of the cutting device.

ES-03: Blast Cleaning – Blast cleaning is a method of preparing steel surfaces using a dry abrasive in a closed-cycle, recirculating abrasive system with centrifugal wheels and abrasives. Depending on the paint/coating required by the customer, some pieces are cleaned prior to the paint/coating being applied. Several different degrees of cleaning may be performed based on the customer's requirements.

There is one (1) Pangborn shot blasting machine at the facility. The shot blasting machine has an integral dust collection and filtration device that is interlocked with the shot blasting process. The respective dust collection and filtration device is turned on automatically any time the shot blaster is turned on.

ES-04: Indoor Coating Application – After cleaning and preparation has been completed, the steel surfaces may receive coatings if desired by the customer. A wide range of materials are used based on the desired end use. Most coatings are high solids “architectural/high performance” type coatings. Some coatings require mixing/thinning.

ES-05: Welding – Welding activities at SteelFab generate emissions of constituents in the welding rods. Welding activities are conducted in various locations throughout the facility.

ES-06: ArcWriter – There is one Hypertherm ArcWriter operated at the facility for automated layout marking/cribbing on mild steel work pieces.

ES-07: Auxiliary Heaters – There are various portable space heaters located throughout the facility to maintain favorable working conditions indoors. There are 25 units rated at 0.10 MMBtu/hr and 5 units rated at 0.14 MMBtu/hr, with a combined heat rating of 3.2 MMBtu/hr. Each unit is capable of combusting natural gas or fuel oil.

SECTION III. EQUIPMENT

EU	Description	Control Device ID	Mfg./Const. Date	Subject to NSPS/NESHAP
ES-01	Plasma Cutting Device – Peddinghaus FPB 1800/3C, inside northwest quadrant of Shop A	CD-1: One pulse jet cartridge system by Torit, Model DF02-8	2018	None
ES-02	Plasma Cutting Device – Peddinghaus HSFD2500	CD-2: One pulse jet cartridge system by Torit, Model DF02-8 or equivalent	2018	None
ES-03	Pangborn Shot Blaster, Norwest Corner of Shop B	CD-3: One pulse jet cartridge system by Torit, Model DF03-12	2018	NESHAP Subpart 6X
ES-04	Painting and Coating inside Building “B” consisting of two HVLP spray devices	N/A	2018	None
ES-05	Welding Throughout Facility	N/A	N/A	NESHAP Subpart 6X
ES-06	Hypertherm ArcWriter	N/A	N/A	None
ES-07	30 Space Heaters (Total 3.2- MMBTUH)	N/A	N/A	None
ES-08	Peddinghaus Peddibot 1100 Robotic Thermal Processing Machine	CD-4: One Lincoln Electric Prism Compact Dust Collector	2023	None
ES-09	Peddinghaus HSFD2500/C Plasma Cutter	CD-5: One pulse jet cartridge system by Torit, Model DF03-12	4/2/2025	None

SECTION IV. EMISSIONS

SteelFab’s facility has a production capacity of approximately 35,000 tons per year of fabricated structural steel. Emissions from the facility have been estimated using industry-specific emission factors, material balance based on quantities, particle size distribution and composition of captured dust, and manufacturer data for filter efficiencies. Unless otherwise stated emissions are based on

8,760 hours per year of operation with combustion sources firing pipeline-grade natural gas or distillate fuel oil with a sulfur content less than 15 ppm.

Plasma Cutting (ES-01, ES-02, ES-08, and ES-09)

Emissions from plasma cutting are based on emission factors for similar types of equipment from “Fume Emissions Testing for Plasma Arc Cutting,” Hypertherm, Inc., October 2006, Table 2A for Test ID A (1/2” Mild Steel). Hypertherm testing was conducted on a cutting table with a shallow layer of water (semi-dry). For uncontrolled emissions, the facility applied an additional factor of 10 for particulates and a factor of 2 for NO_x to account for the dry cutting operations at the SteelFab facility. All PM emissions are assumed to be PM₁₀.

The Hypertherm document only provides total chromium emissions; therefore, hexavalent chromium emissions are based on the ratio of hexavalent to total chromium in the dust collected and analyzed from a similar Torit dust collection system at SteelFab’s Charlotte, North Carolina facility. The overall control efficiency of the Torit dust collection and filtration system is based on an assumed collection efficiency of 90% and a manufacturer provided control efficiency of 95%. ES-08 is a robotic plasma cutting unit in an enclosed booth with inherent dust collection and filtration system, and thus, the capture efficiency for this unit is assumed to be 100% and the control efficiency is 95%.

The new plasma cutter (ES-09) has an inherent Torit Dust collection and filtration system.

EU	Control Device	Capture Efficiency, %	Control Efficiency, %
ES-01	CD-1: One pulse jet cartridge system by Torit, Model DF02-8	90	95
ES-02	CD-2: One pulse jet cartridge system by Torit, Model DF02-8 or equivalent	90	95
ES-08	CD-4: One Lincoln Electric Prism Compact Dust Collector	100	95
ES-09	CD-5: One pulse jet cartridge system by Torit, Model DF03-12	90	95

Plasma Cutting Emissions (ES-01, ES-02, and ES-09)

Pollutant	Uncontrolled EF	Controlled EF ⁽¹⁾	Emissions Per Unit	Total Controlled Emissions
	lb/hr	lb/hr	TPY	TPY
NO _x ⁽²⁾	1.94	1.94	8.50	25.5
PM/PM ₁₀	17.60	2.55	11.18	33.54
HAP				
As	1.76E-03	2.55E-04	1.12E-03	3.36E-04
Cd	1.18E-04	1.71E-05	7.49E-05	2.25E-04
Cr	3.58E-03	5.19E-04	2.27E-03	6.81E-03
Cr (VI)	1.88E-04	2.72E-05 ⁽³⁾	1.19E-04	3.57E-04
Mn	0.15	2.18E-02	9.53E-02	2.86E-01

Pollutant	Uncontrolled EF	Controlled EF ⁽¹⁾	Emissions Per Unit	Total Controlled Emissions
	lb/hr	lb/hr	TPY	TPY
Ni	4.04E-03	5.86E-04	2.57E-03	7.71E-03
P	7.68E-03	1.11E-03	4.88E-03	1.46E-02
Pb	1.17E-03	1.70E-04	7.43E-04	2.23E-03
Sb	5.95E-04	8.63E-05	3.78E-04	1.13E-03
Se	8.45E-04	1.23E-04	5.37E-04	1.61E-03
Total HAPs	-	-	0.11	0.32

(1) Controlled EF reflects 90% collection efficiency and 95% filter efficiency except for NO_x emissions, which are not controlled by dust collector and filter.

(2) Uncontrolled EF of NO_x is referenced as NO_x EF multiplied by two.

(3) EF of Cr (VI) = 5.24% × Cr EF

Plasma Cutting Emissions (ES-08)

Pollutant	Uncontrolled EF	Controlled EF ⁽¹⁾	Emissions
	lb/hr	lb/hr	TPY
NO _x ⁽²⁾	1.94	1.94	8.50
PM/PM ₁₀	17.60	0.88	3.85
HAP			
As	1.76E-03	8.80E-05	3.85E-04
Cd	1.18E-04	5.90E-06	2.58E-05
Cr	3.58E-03	1.79E-04	7.84E-04
Cr (VI)	1.88E-04	9.38E-06 ⁽³⁾	4.11E-05
Mn	0.15	7.50E-03	3.29E-02
Ni	4.04E-03	2.02E-04	8.85E-04
P	7.68E-03	3.84E-04	1.68E-03
Pb	1.17E-03	5.85E-05	2.56E-04
Sb	5.95E-04	2.98E-05	1.31E-04
Se	8.45E-04	4.23E-05	1.85E-04
Total HAPs	-	-	0.04

(1) Controlled EF reflects 100% collection efficiency and 95% filter efficiency except for NO_x emissions, which are not controlled by dust collector and filter.

(2) Uncontrolled EF of NO_x is referenced as NO_x EF multiplied by two.

(3) EF of Cr (VI) = 5.24% × Cr EF

Shot Blasting (ES-03)

Emissions from the shot blasting machine were calculated based the average dust collection rate of 13.36 lb/hr for a Torit-type control device from SteelFab's Charlotte facility. The average dust collection rate from the Charlotte facility is based on the control device taking an average of 108 operating hours to fill a 50-gallon waste drum, with a measured specific gravity of 3.46.

Based on data obtained from Bhaskar Kura, Ph.D., P.E., "Residual Risk from Abrasive Blasting Emissions: Particle Size and Metal Speciation", December 2005, and Wark, K., & Warner, C. (1981). Air pollution: Its Origin and Control (2nd ed., p. 236), the Torit control device was

estimated to have a control efficiency of 99.76%. Therefore, the total pre-controlled dust emission rate was estimated to be 13.39 lb/hr. Subtracting the average dust collection rate from the total pre-controlled dust emission rate results in a controlled emission rate of 3.21×10^{-2} lb/hr. Emission factors for total chromium and hexavalent chromium from dust collected from SteelFab's Charlotte facility were analyzed to be 1,300 mg/kg and 2.85 mg/kg, respectively. Particulate emission factors for other specific elements from shot blasting were obtained by multiplying the emissions rate calculated for the total chromium by the ratio of the specific element to the total chromium content in the process steel as listed in the Material Safety Data Sheets (MSDS). All PM emissions are assumed to be PM₁₀.

Shot Blasting Emissions

Pollutant	EF	Controlled Emissions	
		lb/hr	TPY
PM/PM ₁₀	3.21E-02 lb/hr	3.21E-02	0.14
As	EF _{Cr} * 0.075	<0.01	<0.01
Cd	EF _{Cr} * 0.00833	<0.01	<0.01
Cr	1,300 mg/kg * EF _{PM} * CONV	<0.01	<0.01
Cr (VI)	2.85 mg/kg * EF _{PM} * CONV	<0.01	<0.01
Mn	EF _{Cr} * 1.67	<0.01	<0.01
Ni	EF _{Cr} * 0.883	<0.01	<0.01
Pb	EF _{Cr} * 0.0583	<0.01	<0.01
Sb	EF _{Cr} * 0.75	<0.01	<0.01
Se	EF _{Cr} * 0.75	<0.01	<0.01

EF_{Cr} = Emission factor for Cr

EF_{PM} = Emission factor for PM

CONV = 1×10^{-6} kg/mg

Painting/Coating (ES-04)

Emissions for coating operations are based on the supercoat approach, which uses highest values of pollutants for all coating products. The VOC content, PM content, and HAP content are based on MSDS.

Coating Products

Product ID	Description	Coating Type
AK01-SPG	TNEMEC Shop Primer Gray	Alkyd Primer
AS-24723A	Armorhide AS SP-1000 Gray Spray Primer	Alkyd Primer
B50AV8002	SW STEEL SPEC TM FHP Universal Primer / Finish, Gray	Alkyd Primer
B66A00310	SW Pro-Cryl Universal Primer Gray	Alkyd Primer
0986A1NL	Carboguard 890 Part A	Epoxy
0986B1NL	Carboguard 890 Part B	Epoxy
0840A1NL	Carbothane 133 HB Part A	Acrylic Polyurethane

Product ID	Description	Coating Type
0840B1NL	Urethane Converter 133	Acrylic Polyurethane
0250A1NL	Carbozinc 11 Base	Custom Product Finish
0229B1NL	Zinc Filler Type II	Custom Product Finish
B50A2103	Sherwin Williams Steel Spec 2103 Primer Gray	Alkyd Primer
R7K100	Sherwin Williams Reducer No. 100	Thinner / Reducer
154-2406	Methyl Ethyl Ketone	Thinner
0522S1NL	Carboline Thinner No. 2	Thinner
0525S1NL	Carboline Thinner No. 25	Thinner
0533S1NL	Carboline Thinner No. 33	Thinner

$$\begin{aligned}
 [\text{VOC Content}]_{\text{Supercoat}} &= 0.95 \times [\text{Highest VOC content}]_{\text{All coating}} + 0.05 \times [\text{Highest VOC content}]_{\text{Thinner}} \\
 [\text{PM}_{10} \text{ Content}]_{\text{Supercoat}} &= (0.95 \times [\text{Highest PM}_{10} \text{ content}]_{\text{All coating}} + 0.05 \times [\text{Highest PM}_{10} \text{ content}]_{\text{Thinner}}) \times (0.95 \times [\text{Highest Density}]_{\text{All coating}} + 0.05 \times [\text{Highest Density}]_{\text{Thinner}}) \\
 [\text{HAP Emissions}]_{\text{Supercoat}} &= 0.95 \times [\text{Highest Density}]_{\text{All coating}} + 0.05 \times [\text{Highest Density}]_{\text{Thinner}} \times (0.95 \times [\text{Highest HAP content}]_{\text{All coating}} + 0.05 \times [\text{Highest HAP content}]_{\text{Thinner}})
 \end{aligned}$$

Coating Properties

Product ID	Density	PM ₁₀ Content		VOC Content
	lb/gal	Wt. %	lb/gal	lb/gal
AK01-SPG	11.77	75	8.83	2.89
AS-24723A	11.14	73	8.13	3.00
B50AV8002	13.58	83	11.27	2.78
B66A00310	10.24	51	5.22	0.32
0986A1NL	10.76	83	8.93	1.79
0986B1NL	13.35	87	11.61	1.79
0840A1NL	12.1	74	8.95	3.20
0840B1NL	8.76	64	5.61	3.20
0250A1NL	8.93	55	4.91	4.00
0229B1NL ⁽¹⁾	59.33	100	59.33	--
B50A2103	13.68	84	11.49	2.78
R7K100	7.32	--	--	7.32
154-2406	6.68	--	--	6.68
0522S1NL	7.09	--	--	7.09
0525S1NL	7.44	--	--	7.44

Product ID	Density	PM ₁₀ Content		VOC Content
	lb/gal	Wt. %	lb/gal	lb/gal
0533S1NL	7.41	--	--	7.41

⁽¹⁾ This coating product is excluded from the supercoating analysis for VOC and PM₁₀ calculations as the solid zinc creates an outlier not congruent with the rest of the coating lineup. The exception of this is methanol, which was included for a more conservative "supercoat."

Coating HAP Content⁽¹⁾

Product ID	C	E	HD	M	MIBK	N	T	X	Z
	Wt. %								
AK01-SPG	--	1.00	--	--	--	--	--	--	--
AS-24723A	--	0.10	--	--	--	--	--	--	--
B50AV8002	--	2.00	--	--	6.00	--	--	11.00	2.00
B66A00310	--	--	--	--	--	--	--	--	--
0986A1NL	--	2.50	--	--	--	--	--	10.00	--
0986B1NL	--	2.50	--	--	--	--	10.00	10.00	--
0840A1NL	--	10.00	--	--	--	--	10.00	10.00	--
0840B1NL	--	2.50	1.00	--	--	--	--	10.00	--
0250A1NL	--	1.00	--	10.00	10.00	--	--	--	--
0229B1NL	--	--	--	--	--	--	--	--	100.00
R7K100	1.00	0.40	--	--	--	7.00	--	1.00	--
154-2406	--	--	--	--	--	--	--	--	--
0522S1NL	--	--	--	--	--	--	--	--	--
0525S1NL	10.00	25.00	--	--	--	--	--	50.00	--
0533S1NL	1.00	1.00	--	--	--	--	--	--	--

⁽¹⁾ C = Cumene, E = Ethylbenzene, HD = Hexamethylene Diisocyanate, M = Methanol, MIBK = Methyl Isobutyl Ketone, N = Naphthalene, T = Toluene, X = Xylene, Z = Zinc

Supercoat Properties

Coating	Density	VOC Content	PM Content
	lb/gal	lb/gal	lb/gal
Supercoat	13.37	3.41	10.79

Based on the last five years, the highest annual usage was 8,626 gal/yr in 2022. Worst-case annual emissions are based on 12,000 gal/yr, which is derived from an annual average coating usage of 8,000 gal/yr multiplied by a 1.5 safety factor. All PM emissions are assumed to be PM₁₀.

Coating Emissions

Pollutant	EF	Worst-Case Emissions
	lb/gal	TPY
VOC	3.41	20.45
PM/PM ₁₀	10.79	22.67
Cumene	0.07	0.40
Ethylbenzene	1.27	7.67
HDI	0.02	0.13

Pollutant	EF	Worst-Case Emissions
	lb/gal	TPY
VOC	3.41	20.45
PM/PM ₁₀	10.79	22.67
Methanol	0.40	2.40
MIBK	0.76	4.57
Naphthalene	0.05	0.28
Toluene	1.71	10.36
Xylene	1.72	10.39
Total HAPs	-	36.20

Welding (ES-05)

Emissions from welding activities were calculated using emission factors from AP-42 (1/95), Section 12.19, a maximum welding rod consumption rate of 100,000 lb per year, and a safety factor of two. The percentage usage of three types of welding rods is 90% E71T FCAW, 5% each for E7018 SMAW and ER70S GMAW.

Welding Rod Emissions

Pollutant	E71T FCAW Welding Rod		E7018 SMAW Welding Rod		ER70S GMAW Welding Rod		Totals
	EF	Emissions	EF	Emissions	EF	Emissions	Emissions
	lb/1,000 lb	TPY	lb/1,000 lb	TPY	lb/1,000 lb	TPY	TPY
PM ₁₀	12.2	1.22	18.4	1.84	5.2	0.52	1.28
Cr	2.00E-03	2.00E-04	6.00E-03	6.00E-04	1.00E-03	1.00E-04	2.25E-04
Co	1.00E-03	1.00E-04	1.00E-03	1.00E-04	1.00E-03	1.00E-04	1.05E-04
Mn	6.62E-01	6.62E-02	1.03E+00	1.03E-01	3.18E-01	3.18E-02	6.96E-02
Ni	4.00E-03	4.00E-04	2.00E-03	2.00E-04	1.00E-03	1.00E-04	3.95E-04

ArcWriting (ES-06)

Emissions from the Hypertherm ArcWriting unit were calculated using emission factors from “Fume Emissions Testing for Plasma Arc Cutting,” Hypertherm, Inc., October 2006, , Table 2A for Test ID A (1/2” Mild Steel). Hypertherm testing was conducted on a cutting table with a shallow layer of water (semi-dry).. PM emissions are based on the full-scale plasma cutting emission factors multiplied by a ratio of actual cutting depth to plasma cutting depth in which the emission factors are based. NO_x emissions are based on the full-scale plasma cutting emission factors multiplied by the ratio of amperage use of the ArcWriter to plasma cutter amperage use in which the emission factors are based. ArcWriting emissions are presented in the following table.

ArcWriter Emissions

Pollutant	Emission Factor	Ratio of ArcWriter Cut Depth vs Full-Scale Plasma Cutter	Ratio of ArcWriter Amperage vs Full-Scale Plasma Cutter	Total Emissions	
	lb/hr			lb/hr	TPY
NO _x	0.97	-	6.4%	0.06	0.27
PM ₁₀	1.76	32.4%	-	0.57	2.49

HAP Emissions

HAP	Uncontrolled EF	Emissions
	lb/hr	TPY
As	5.65E-05	2.48E-04
Cd	3.79E-06	1.66E-05
Cr	1.15E-04	5.04E-04
Mn	4.82E-03	2.11E-02
Ni	1.30E-04	5.68E-04
P	2.47E-04	1.08E-03
Pb	3.76E-05	1.65E-04
Sb	1.91E-05	8.37E-05
Se	2.71E-05	1.19E-04
Total HAPs	-	2.39E-02

Auxiliary Heaters (ES-07)

Emissions from the thirty (30) auxiliary heaters are based on a combined heat input of 3.20 MMBTUH, emission factors from AP-42 (7/98) Section 1.4, Tables 1.4-1, 1.4-2, and 1.4-3 for natural gas combustion, and AP-42 (5/10), Tables 1.3-1, 1.3-3, 1.3-6, 1.3-9 and 1.3-12 for fuel oil combustion with a sulfur content of 0.0015%. Potential to emit is based on the worst-case resultant emissions from either combustion of natural gas or fuel oil.

Auxiliary Heaters Emissions

Pollutant	Natural Gas Combustion			Fuel Oil Combustion		
	EF	Emissions ⁽¹⁾		EF	Emissions ⁽²⁾	
	lb/10 ⁶ scf	lb/hr	TPY	lb/10 ³ gal	lb/hr	TPY
NO _x	100	0.31	1.37	20.0	0.46	2.00
CO	84	0.26	1.15	5.0	0.11	0.50
VOC	5.5	0.02	0.08	0.34	0.01	0.03
SO ₂	0.6	<0.01	0.01	142S ⁽³⁾	<0.01	0.02
PM ₁₀	7.6	0.02	0.10	2.0	0.05	0.20
HAPs ⁽⁴⁾	1.88	<0.01	0.03	0.04	<0.01	<0.01

⁽¹⁾ Based on a fuel heating value of 1,020 Btu/scf.

⁽²⁾ Based on a fuel heating value of 140 MMBtu/10³ gal.

⁽³⁾ Based on a sulfur content of 0.0015%.

⁽⁴⁾ Based on sum of all HAP emission factors.

Grinding & Sawing Activities

The PM₁₀ emissions from these operations are estimated based on material sawing rate of 14,022.44 lb of steel/hr, an assumption of 2% of steel material required grinding/sawing, an assumption of 2% of steel material removed by grinding/sawing, and an assumption of 1% of dust emitted from steel material removed by grinding/sawing. The hourly rate of 14,022.44 lb of steel/hr is based on doubled facility's annual production of 35,000,000 per year and 4,992 hrs of operation/yr to give the most conservative PTE estimation. The HAP emissions are based on metal HAP content, total composition of the Nucor bar, and structural mild steel products.

Hourly throughput = (35,000,000 lbs of steel/yr) × 2 factor ÷ 4,992 hrs of operation/yr
 = 14, 022.44 lb/hr

PM₁₀ Emissions = 14,022.44 lb/hr × 2% × 2% × 1% = 5.61E-02 lb PM₁₀/hr
 = 5.61E-02 lb PM₁₀/hr × 8,760 hrs/yr × 1 Ton/2,000 lb = 0.245 TPY PM₁₀

HAP Emissions = Hourly PM₁₀ Emission Rate × HAP Content × 8,760 hrs/yr × 1 Ton/2,000 lb

HAP	Content, %	HAP Emissions
Arsenic, As	0.09	2.21E-04
Cadmium, Cd	0.01	2.45E-05
Cobalt, Co	0.09	2.21E-04
Chromium, Cr	1.20	2.94E-03
Manganese, Mn	2.00	4.90E-03
Nickel, Ni	1.00	2.45E-03
Phosphorus, P	0.90	2.21E-03
Lead, Pb	0.07	1.72E-04
Antimony, Sb	0.90	2.21E-03
Selenium, Se	0.20	4.90E-04
Beryllium	0.09	2.21E-04
Total		1.60E-02

Facility-Wide Emissions

EU	Description	NO _x	CO	PM ₁₀	VOC	Total HAPs
		TPY	TPY	TPY	TPY	TPY
ES-01	Plasma Cutting	8.50	-	11.18	-	0.11
ES-02	Plasma Cutting	8.50	-	11.18	-	0.11
ES-03	Shot Blasting	-	-	0.14	-	<0.01
ES-04	Painting/Coating	-	-	22.67	20.45	36.20
ES-05	Welding	-	-	1.27	-	0.07
ES-06	ArcWelding	0.27	-	2.49	-	0.02
ES-07	Auxiliary Heaters ⁽¹⁾	2.00	1.65	0.20	0.08	0.03
ES-08	Plasma Cutting	8.5	-	3.85	-	0.04
ES-09	Plasma Cutting	8.50	-	11.18	-	0.11
N/A	Grinding & Sawing	-	-	0.25	-	0.016
Total		36.27	1.65	64.41	20.53	36.71

EU	Description	NO _x	CO	PM ₁₀	VOC	Total HAPs
		TPY	TPY	TPY	TPY	TPY
Permit No. 2018-0199-O (M-1)		27.77	1.65	52.93	20.53	36.56
Difference		8.50	-	11.48	-	0.15
Requested Limits ⁽²⁾		99.90	4.99	99.90	99.90	24.90

⁽¹⁾ Emissions are represented in this table based on the worst-case fuel option, distillate fuel oil.

⁽²⁾ SteelFab requested facility-wide TPY emission caps, which were established in Permit No. 2018-0199-C and will be carried forward from the previous permit.

Facility-Wide HAP Emissions

HAP	TPY
Arsenic, As	1.19E-03
Cadmium, Cd	2.92E-04
Cobalt, Co	3.26E-04
Chromium, Cr	0.01
Chromium V, Cr(V)	3.98E-04
Manganese, Mn	0.41
Nickel, Ni	0.01
Phosphorus, P	0.02
Lead, Pb	2.82E-03
Antimony, Sb	0.00
Selenium, Se	1.19E-03
Cumene	0.40
Ethylbenzene	7.67
HDI	0.13
Methanol	2.40
MIBK	4.57
Naphthalene	0.28
Toluene	10.36
Xylene	10.39
Other HAPs	0.03
Total	36.71

Potential emissions of any single HAP are greater than 10 TPY with the most significant being xylene (10.39 TPY), and potential emissions of total HAP are 36.71 TPY. The facility will limit operations such that HAP emissions are below major source thresholds. SteelFab requested facility-wide TPY emission caps of 9.90 TPY for any single HAP and 24.90 TPY for total HAP, which were established in Permit No. 2018-0199-C and will be carried forward from the previous permit.

SECTION V. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions)

[Applicable]

Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]

This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]

Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]

Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Required annual information (Turn-Around Document) shall be provided to Air Quality by April 1st every year.

OAC 252:100-7 (Permits for Minor Facilities) [Applicable]

This facility (with controls listed in this permit) qualifies as a synthetic minor source because the uncontrolled Hazardous Air Pollutants (HAP) emissions have the potential to exceed 10 TPY for any one HAP and 25 TPY for any aggregate of HAP. Facility requested emission limits to maintain synthetic minor source.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]

Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]

Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]

Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment. Particulate emission limits are based on maximum design heat input rating, as described in Appendix C.

Appendix C specifies a PM emission limitation of 0.60 lb/MMBTU for all equipment with a heat input rating of 10 MMBTUH or less. For equipment with rated heat input greater than 10 but less than 1,000 MMBTUH, the PM limit is calculated using the equation from OAC 252:100 Appendix C, which is listed below.

$$E = 1.0428080X^{(-0.238561)}$$

Where:

E = allowable total particulate matter emissions in pounds per MMBTH

X = the maximum heat input in MMBTU

For the auxiliary heaters, AP-42 (7/98) Section 1.4, Table 1.4-2 lists PM emission factors for natural gas-fired small heaters to be 7.6 lb/MMSCF or about 0.0075 lb/MMBtu. AP-42 (5/10) Section 1.3, Tables 1.3-1 lists PM emission factors for distillate fuel oil combustion to be 2.0 lb/10³ gal or about 0.014 lb/MMBtu. Therefore, all heaters are complied with this subpart.

EU	Description	Heat Rate	Appendix C PM ₁₀ Limitation	Potential PM ₁₀ Emissions
		MMBTUH	lb/MMBTU	lb/MMBTU
ES-07	Auxiliary Heaters (30)	3.20 (total)	0.60	0.014

Section 19-12 limits particulate emissions from new and existing directly fired fuel-burning units (and/or) emission points in an industrial process based on process weight rate, as specified in Appendix G.

$$E = 4.10P^{0.67}$$

Where:

E = allowable total particulate matter emissions in pounds per hour

P = process weight rate in tons per hour (TPH)

The facility has an estimated process weight rate of 6.73 tons per hour based on an annual production capacity of 35,000 tons per year, with actual operations occurring 312 days per year, 16 hours per day for all emission units except for EU# ES-04 (painting) and ES-05 (welding). Painting throughput based on hourly rate of 5.63 gal/hr (derived from HVLV spray gun rate) and supercoat density of 13.37 lb/gal. This resulted to 75.27 lb/hr, which is less than 100 lb/hr. Thus, EU# ES-04 is exempted from this regulation. The annual welding rod consumption is 200,000 pounds per year (with safety factor) or 0.0114 TPH (22.83 lb/hr). Since the process rate of EU# ES-05 is less than 100 lb/hr, this EU is exempted from this regulation.

EU	Process Rate	Appendix G Allowable Emission Limit	Potential PM Emission Rate
	TPH	lb/hr	lb/hr
ES-01	6.73	14.71	2.55
ES-02	6.73	14.71	2.55
ES-03	6.73	14.71	0.14
ES-06	6.73	14.71	0.57
ES-08	6.73	14.71	0.88
ES-09	6.73	14.71	2.55
Grinding & Sawing ⁽¹⁾	0.13	1.05	0.06

⁽¹⁾ Estimated 2% of total steel material required grinding. (0.02 × 35,000 TPY = 700 TPY or 0.13 TPH)

OAC 252:100-25 (Visible Emissions and Particulates)

[Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. The permit will require that fuel-burning units be fueled with natural gas and/or fuel oil with a sulfur content of 0.0015% to ensure compliance with these requirements.

OAC 252:100-29 (Fugitive Dust)

[Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2 limits the ambient air concentration of hydrogen sulfide (H_2S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to $283 \mu\text{g}/\text{m}^3$. Fuel-burning equipment fired with pipeline natural gas and/or fuel oil with a sulfur content of 0.0015% will not have the potential to exceed the H_2S ambient air concentration limit.

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input, 3-hour average. The auxiliary heaters located at this facility are capable of firing natural gas or distillate fuel oil as fuel. Gaseous fuels are limited to 0.2 lb/MMBtu heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 Btu/scf, this limit corresponds to fuel sulfur content of 1,203-ppmv. AP-42 (7/98) Section 1.4, Table 1.4-2 lists SO_2 emissions at $0.6 \text{ lb}/10^6 \text{ scf}$ (approximately 0.0006 lb/MMBtu) for fuel gas. When combusting natural gas, the fuel-burning equipment shall only be fueled with pipeline natural gas. Pipeline natural gas is subject (under Part 72) to a limit of 0.5 grains of total reduced sulfur (TRS) per 100 scf. For liquid fuels, the limit is 0.8 lb/MMBtu. AP-42 (5/10) Section 1.3, Table 1.3-1 lists SO_2 emissions at $142\text{S lb}/10^3 \text{ gal}$ where S represents the sulfur content of the fuel oil. For distillate fuel with a sulfur content of 0.0015%, this corresponds to an emission rate of 0.0015 lb/MMBtu. When combusting liquid fuels, the fuel-burning equipment shall only be fueled with distillate fuel oil with a sulfur content of 0.0015% or less.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_x per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Part 7 Applicable]

Part 3 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with

a permanent submerged fill pipe or with an organic vapor recovery system. There are no storage tanks at this facility that store any contents which have a vapor pressure more than 1.5 psia.

Part 5 limits the VOC content of coatings used in coating lines or operations.

Coating Type Limits (As Applied) from OAC 252:100-37-25

Coating Type	Definition	Limitation (lb-VOC/gal)
Alkyd primer	A chemical coating composed primarily of alkyd applied to a surface to provide a firm bond between the substrate and any additional coating	4.8
Vinyl	A chemical coating containing plasticized or unplasticized polymers and co-polymers of vinyl acetate, vinyl chloride, polyvinyl alcohols or their condensation products. The primary mode of cure is solvent evaporation.	6.0
Nitrocellulose lacquer (NC lacquer)	A chemical coating containing nitrocellulose and suitable resinous modifiers. The primary mode of cure is solvent evaporation.	6.4
Acrylics	A chemical coating containing polymers or co-polymers of acrylic or substitute acrylic acid in combination with resinous modifiers. The primary mode of cure is solvent evaporation.	6.0
Epoxies	A chemical coating containing epoxy groups and suitable chemical cross-linking agents. The primary mode of cure involves a chemical reaction between the epoxy and the cross-linking agent.	4.8
Maintenance finishes	A chemical coating that protects a given substrate from adverse chemical or physical conditions.	4.8
Custom products finish	A proprietary chemical coating designed for a specific customer and use.	6.5

Review of Coating VOC Content Per OAC 252:100-37-25

Product ID	VOC Content	Coating Type	Subchapter 37 limit	Exceed?
	lb/gal		lb-VOC/gal	
AK01-SPG	2.89	Alkyd Primer	4.8	No
AS-24723A	3.00	Alkyd Primer		No
B50AV8002	2.78	Alkyd Primer		No
B66A00310	0.32	Alkyd Primer		No
B50A2103 ⁽¹⁾	2.78	Alkyd Primer		No
0986A1NL	1.79	Epoxy	4.8	No
0986B1NL	1.79	Epoxy		No
0840A1NL	3.20	Acrylic Polyurethane	6.0	No
0840B1NL	3.20	Acrylic Polyurethane		No

Product ID	VOC Content	Coating Type	Subchapter 37 limit	Exceed?
	lb/gal		lb-VOC/gal	
0250A1NL	4.00	Custom Product Finish	6.5	No
0229B1NL	0.00	Custom Product Finish		No
R7K100	7.32	Thinner / Reducer	N/A	No
154-2406	6.68	Thinner		No
0522S1NL	7.09	Thinner		No
0525S1NL	7.44	Thinner		No
0533S1NL	7.41	Thinner		No

The SDS for the coating products show that all the coating products used at this facility are under the VOC limits listed in this section. Therefore, the facility is in compliance with this section.

Part 5 also requires all emissions of VOC from the cleanup of any article, machine, or equipment used in applying coatings to be included when determining compliance with the above stated solvent limitations and emission limits. While actual lb VOC/gallon values shown in the previous table do not include solvents used for cleaning, specific conditions have been included into the permit requiring the compliance demonstration to include all solvents used for cleanup.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The fuel-burning equipment (ES-07) at this location is subject to this requirement.

OAC 252:100-42 (Toxic Air Contaminants (TAC))

[Applicable]

This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement.

SECTION VI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60

[Not Applicable]

Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units with a maximum design heat input capacity between 10 and 100 MMBTUH that commenced construction, modification, or reconstruction after June 9, 1989. There is no boiler at this facility. Therefore, this subpart is not applicable.

Subparts K, Ka, Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity for Subpart Kb and 40,000 gallons for Subparts K and Ka. There are no storage tanks at this site. Therefore, this subpart is not applicable.

Subpart VVV, Polymeric Coating of Supporting Substrates Facilities. This subpart applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. This facility does not engage in these activities.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, concerns only process streams that contain more than 10% benzene by weight. Analysis of Oklahoma natural gas indicates a maximum benzene content of less than 1%.

NESHAP, 40 CFR Part 63

[Subpart XXXXXX is Applicable]

Subpart T, Halogenated Solvent Cleaning. This subpart applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these HAP solvents with a total concentration greater than 5 percent by weight, as cleaning and/or drying agent. This facility does not use halogenated solvents for cleaning.

Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. This subpart establishes standards for miscellaneous metals parts and products surface coating facilities for major sources of HAP. This subpart sets forth limitations on coating HAP content. Compliance with these limitations can be met through one of three options: 1) compliance material, 2) emission rate without add-on controls, and 3) emission rate with add-on controls. The facility is not a major source of HAP emissions; therefore, the facility is not subject to this subpart.

Subpart NNNN, Surface Coating of Large Appliances. This subpart applies to facilities that are major source of HAP emissions and that apply coatings to large appliance parts or products. This facility is not a major source of HAP emissions and does not engage in these operations.

Subpart PPPP, Surface Coating of Plastic Parts and Products. This subpart establishes standards for plastic parts and products surface coating facilities that use 100 gallons per year or more of coatings that contain HAPs and is a major source of HAP emissions. This facility is an area source of HAPs and does not engage in these operations. Therefore, this facility is not subject to this subpart.

Subpart DDDDD, Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The subpart affects industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. Process heaters do not include units used for comfort heat or space heat, food preparation for on-site consumption, or autoclaves. This facility is not a major source of HAP emissions and is therefore not subject to this subpart.

Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. This subpart establishes requirements for area sources of HAP involving paint stripping operations involving the use of chemical strippers containing methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). This facility does not engage in stripping operations or autobody refinishing operations. The facility does not use spray coating paints that contain any of the target HAPs in this subpart. Therefore, this facility is not subject to this subpart.

Subpart JJJJJ, Industrial, Commercial, and Institutional Boilers Area Sources. This subpart applies to industrial, commercial, and institutional boilers as defined under this subpart located at an area source of HAP emissions. This facility does not have a boiler, and thus, this subpart does not apply.

Subpart XXXXXX, Area Source Standards for 9 Metal Fabrication and Finishing Source Categories. This subpart affects area sources that are primarily engaged in one of the nine source categories listed in this subpart that use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP) while performing dry abrasive blasting, machining, dry grinding and polishing, spray painting, or welding. MFHAP means any compound of the following metals: cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form with the exception of lead. A material that contains one or more of the MFHAP cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or contains manganese in an amount greater than or equal to 1.0 percent by weight (as the metal) is considered to be a material that contains MFHAP, as shown in formulation data provided by the manufacturer or supplier, such as the Safety Data Sheets for the material. The nine source categories described in Table 1 of this subpart are listed below with their potential SIC/NAICS Codes:

EPA Source Category		SIC Description	SIC	NAICS	NAICS Description
1	Electrical & Electronic Equipment Finishing Ops	Motors & Generators Mfg.	3621	335312	Motor & Generator Mfg.
		Electrical Machinery, Equipment, & Supplies, NEC	3699	335999	All Other Misc. Electrical Equipment & Component Mfg.
2	Fabricated Metal Products, NEC	Fabricated Metal Products, NEC	3499	332117	Powder Metallurgy Part Mfg.
		Fabricated Metal Products, NEC	3499	332999	All Other Miscellaneous Fabricated Metal Product Mfg.
3	Fabricated Plate Work (Boiler Shops)	Fabricated Plate Work & Boiler Shops	3443	332313	Plate Work Mfg.
				332410	Power Boiler & Heat Exchanger Mfg.
				332420	Metal Tank (Heavy Gauge) Mfg.
4	Fabricated Structural Metal Mfg.	Fabricated Structural Metal Fabrication	3441	332312	Fabricated Structural Metal Mfg.
5	Heating Equipment, except Electric	Heating Equipment, except electric	3433	333414	Heating Equipment (except Warm Air Furnaces) Mfg.
6	Industrial Machinery & Equipment: Finishing Ops	Construction Machinery Manufacturing	3531	333120	Construction Machinery Mfg.
		Oil & Gas Field Machinery Equipment Mfg.	3533	333132	Oil & Gas Field Machinery and Equipment Mfg.
		Pumps & Pumping Equipment Mfg.	3561	333911	Pump & Pumping Equipment Mfg.
7	Iron & Steel Forging	Iron and Steel Forging	3462	332111	Iron & Steel Forging
8	Primary Metals Products Mfg.	Primary Metals Products Mfg.	3399	332618	Other Fabricated Wire Product Mfg.
9	Valves & Pipe Fittings, NEC	Valves & Pipe Fittings, NEC	3494	332919	Other Metal Valve & Pipe Fitting Mfg.

This facility has SIC 3441 /NAICS 332312 codes, and thus, this facility is one of nine source categories. Per §63.11514, the provisions of this subpart apply to each new and existing affected source listed and defined below which use materials that contain MFHAP or that have the potential to emit MFHAP:

- (1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations;
- (2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations;
- (3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations;
- (4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray applied painting operations. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to

- a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning).
- (5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations.

Spray painting affected source(s) subject to the requirements of this subpart are not subject to the miscellaneous surface coating provisions of Subpart HHHHHH. This subpart does not apply to research or laboratory facilities or to tool or equipment repair operations, facility maintenance, or quality control activities.

Operation	Subject ?	Justification
Plasma Cutting (EU ES-01, ES-02, ES-08, ES-09)	No	Facility provided EPA Region 10's determination, which is based on "Nine Metal Fabrication and Finishing Area Source Categories, 40 CFR Part 63 Subpart XXXXXX(6X) NESHAP, Question & Answer Document revised in June 2020, that laser cutting does meet the definition of "machining" under this subpart but the actual operation is closer to welding since the same equipment is used to cut and melt metal pieces to join them. Since plasma cutting is similar to laser cutting, plasma cutting does not meet the definition of "machining". In addition, plasma cutting is does not meet the definition of "welding" under this subpart since no fillers or consumables were used in this operation.
Shot Blasting (EU ES-03)	Yes	This is a dry abrasive blasting affected source.
Painting/Coating (EU ES-04)	No	No MFHAPs are used in the coating products. Therefore, this operation is not subject per §63.11514 (b)(4).
Welding (EU ES-05)	Yes	This is a welding operation that emits MFHAP.
Arc Writing (EU ES-06)	No	This operation is also a plasma cutting operation, and thus, this operation is not subject to the standards of machining under this subpart per EPA's determination.
Dry Grinding (Grinding & Sawing)	No	The grinding operation at this facility is hand grinding not grinding in fixed or stationary machines as defined under "dry grinding and dry polishing with machines" of this subpart. Therefore, this operation does not subject to this subpart.

The facility is engaged in the source category of fabricated structural metal manufacturing and the facility includes one or more of the affected sources which emit MFHAP regulated by this subpart. Therefore, the facility is subject to the requirements of Subpart XXXXXX. All applicable requirements have been incorporated into the permit.

Parameter	Requirement/Compliance Demonstration
Compliance Standards	§63.11516(a) – Standards for dry abrasive blasting §63.11516(b) – Standards for machining §63.11516(c) – Standards for dry grinding and dry polishing with machines §63.11516(d) – Standards for control of MFHAP in spray painting §63.11516(f) – Standards for welding
Monitoring	§63.11517(a)-(b) – Visual determination of fugitive emissions §63.11517(c)-(d) – Visual determination of emissions opacity for welding Tier 2 or 3
Notification, recordkeeping, and reporting	§63.11519 – Requirements for notification, recordkeeping, and reporting

SECTION VII. COMPLIANCE

Tier Classification

This application has been classified as **Tier I** based on the request for modification of a minor source operating permit under the FESOP Traditional NSR Process.

The draft permit will undergo public notice on the DEQ's web site as required in OAC 252:4-7-13(g). The public, tribal governments, and the EPA will have 30 days to comment on the draft permit. Permits available for public review and comment are found at Air Quality section of the DEQ Web page: <https://oklahoma.gov/deq.html>.

Landowner Affidavit

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

Enforcement Case/Violation

There is no active enforcement case for this facility.

Testing

No testing is required at this time.

Inspection

An inspection was determined to not be necessary as part of this review.. The following full compliance evaluation was conducted since the facility began operations.

FCE ID	Inspection Date	Note
10724	6/20/2025	Inspector – Rodney Pesch Summary – No compliance issues discovered during this FCE.

Fee Paid

A fee of \$750 was paid for a minor source operating permit on October 17, 2025.

SECTION VIII. SUMMARY

The facility has demonstrated the ability to comply with all applicable Air Quality rules and regulations. There is no active enforcement case concerning this facility. Issuance of the construction permit is recommended, contingent upon public, tribal and EPA review.

DRAFT

**PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**SteelFab Texas, Inc.
SteelFab Texas**

FESOP No. 2018-0199-O (M-2)

The permittee is authorized to operate in conformity with the specifications submitted to the Air Quality Division on October 27, 2025. The Evaluation Memorandum dated October 20, 2026, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Facility equipment and points of emissions:

EU	Description	Control Device ID	Mfg./Const. Date
ES-01	Plasma Cutting Device – Peddinghaus FPB 1800/3C, inside northwest quadrant of Shop A	CD-1: One pulse jet cartridge system by Torit, Model DF02-8	2018
ES-02	Plasma Cutting Device – Peddinghaus HSFDP2500	CD-2: One pulse jet cartridge system by Torit, Model DF02-8 or equivalent	2018
ES-03	Pangborn Shot Blaster, Norwest Corner of Shop B	CD-3: One pulse jet cartridge system by Torit, Model DF03-12	2018
ES-04	Painting and Coating inside Building “B” consisting of two HVLP spray devices	N/A	2018
ES-05	Welding Throughout Facility	N/A	N/A
ES-06	Hypertherm ArcWriter	N/A	N/A
ES-07	30 Space Heaters (Total 3.2-MMBTUH)	N/A	N/A
ES-08	Peddinghaus Peddibot 1100 Robotic Thermal Processing Machine	CD-4: One Lincoln Electric Prism Compact Dust Collector	2023
ES-09	Peddinghaus HSFDDB-2500/C Plasma Cutter	CD-5: One pulse jet cartridge system by Torit, Model DF03-12	4/2/2025
N/A	Grinding & Sawing	N/A	N/A

- 2. Facility-Wide Emission Limits:** Emissions from all sources at the facility will be limited by, and contribute to, the facility-wide cap. Facility-wide emissions shall not exceed the emission limits shown in the table below. Compliance with the emission limits shall be determined monthly and be based on a 12-month rolling total. Each calendar month, the permittee shall calculate emissions using the method outlined in (a), (b), and (c) below.

Facility-Wide Emission Limits

Pollutant	Limits, TPY
NO _x	99.90
CO	4.99
VOC	99.90
PM ₁₀	99.90
Single HAP	<9.99
Total HAPs	<24.99

- a. For plasma cutting operation (ES-01, 02, 08, and 09), the emissions shall be calculated on a monthly basis and shall be based on emission factors from "Fume Emissions Testing for Plasma Arc Cutting," Hypertherm, Inc., October 2006, Manchester, New Hampshire.
 - b. For shot blasting operation (ES-03), the emissions shall be calculated on a monthly basis and shall be based on an uncontrolled particulate matter emission factor of 13.39 lb/hr.
 - c. For welding (ES-05), the emissions shall be calculated on a monthly basis using emission factors from the most recent version of AP-42 Section 12.19.
 - d. For painting/coating operations (ES-04), the monthly emissions shall be calculated based on material usage, and the maximum PM₁₀/VOC/HAP content in the SDS of the materials used minus any materials that are recycled or disposed of in such a manner that would prevent their release into the atmosphere.
 - e. For heaters (ES-07), the permittee shall record the type of fuel, the quantity of fuel consumed (monthly and 12-month rolling total) or utilize maximum potential fuel usage, and shall compute the emissions of NO_x, CO, VOC, PM₁₀, SO₂, and HAPs using the latest factors from AP-42 Section 1.4 or manufacturer's emission factors.
 - f. For sawing/grinding operation, the permittee shall record the steel cutting throughput and use the mass balance method listed in the memorandum to estimate PM₁₀, and HAPs emissions.
3. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year).
 4. The fuel-burning equipment shall be fired with either pipeline natural gas or distillate fuel oil with a sulfur content of 0.0015% or less. Pipeline natural gas is subject (under Part 72) to a limit of 0.5 grains or less of total reduced sulfur (TRS) per 100 scf. Compliance can be shown by the following methods: for pipeline natural gas, a current gas company bill; for fuel oil, supplier's latest delivery ticket(s). Compliance shall be demonstrated at least once every calendar year.
 5. For EU# ES-1, 2, and 9, emissions from plasma cutting operations shall be controlled by a dry filter dust collection system with a capture efficiency of at least 90% and control efficiency of at least 95%. The dust collection system shall be maintained and operated within 0.5" to 6.0" w.g. to maintain the required efficiencies. The filter should be replaced when the pressure drop reaches 6.0" w.g. or greater. The facility shall record pressure reading of the control device.

6. For EU# ES-08, emissions from plasma cutting operations shall be controlled by a dry filter dust collection system with a capture efficiency of at least 100% and control efficiency of at least 95%. The dust collection system shall be maintained and operated within 0.5" to 6.0" w.g. to maintain the required efficiencies. The filter should be replaced when the pressure drop reaches 6.0" w.g. or greater. The facility shall record daily pressure reading of the control device.
7. Emissions from shot blasting operations (ES-03) shall be controlled by dry filters, with a control efficiency of at least 99.76%. The filters shall be maintained and operated with a pressure drop of 0.5" to 6.0" w.g. The filter should be replaced when the pressure drop reaches 6.0" w.g. or greater.
8. Cleaning solvent used in cleaning painting applicators shall be drained directly from the applicators to containers which are closed and sealed except when draining is being conducted.
9. Painting/coating operations (ES-04) shall be limited as follows:
- a. The VOC content of the coatings (mixed or unmixed), less water and exempt solvents, shall not exceed the following limits and shall include all solvents used to clean up any article, machine, or equipment used in applying coatings:

Coating	lb/gallon
Alkyd Primers	4.8
Epoxyes	4.8
Maintenance Finishes	4.8
Vinyls	6.0
Acrylics	6.0
NC Lacquers	6.4
Custom Product Finishes	6.5

- b. The permittee shall demonstrate compliance monthly with the lb VOC/gal limits above for each coating product by keeping SDS records of all coating products used in this operation.
 - c. Coating operations shall be conducted using high-volume, low-pressure (HVLP) spray guns.
10. The facility is subject to 40 CFR Part 63, NESHAP, Subpart XXXXXX, Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The permittee shall comply with all applicable requirements, including but not limited to, the following:
- a. §63.11514, Am I subject to this subpart?
 - b. §63.11515, What are my compliance dates?
 - c. §63.11516, What are my standards and management practices?
 - d. §63.11517, What are my monitoring requirements?
 - e. §63.11519, What are my notification, recordkeeping, and reporting requirements?
 - f. §63.11521, Who implements and enforces this subpart?

- g. §63.11522, What definitions apply to this subpart?
- h. §63.11523, What General Provisions apply to this subpart?
- i. Appendix, Table 1 to Subpart XXXXXX of Part 63, Description of Source Categories Affected by This Subpart
- j. Appendix, Table 2 to Subpart XXXXXX of Part 63, Applicability of General Provisions to Metal Fabrication Area Sources

11. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request.

- a. Coating, thinner, and solvent usage, including amounts mixed, reclaimed, and disposed (monthly and 12-month rolling total).
- b. Facility-wide emissions of NO_x, CO, VOC, PM₁₀, individual HAP, and combined HAP, (monthly and 12-month rolling totals). Required records shall be sufficient to demonstrate compliance with the annual limitations of Specific Condition 2.
- c. Information documenting manufacturer's ratings for filter media, records of inspections, including pressure monitoring, and maintenance performed on the air pollution control equipment, as recommended by the manufacturer, but no less than weekly for inspections and daily for pressure monitoring.
- d. SDS for all coatings, thinners, and solvents showing the coating's content (VOC & PM₁₀) by weight of each, less water and solids, and the percentage by weight of all HAP.
- e. Records of natural gas and/or fuel oil usage.
- f. For the fuel(s) burned, the appropriate document(s) as specified in S.C. No. 4.
- g. Records of welding rods usage.
- h. Records of steel cutting throughput.
- i. Records required by NESHAP, 40 CFR Part 63, Subpart XXXXXX.

12. Upon issuance, FESOP No. 2018-0199-O (M-2) shall replace and supersede all previous Air Quality operating permits and/or authorizations issued to this facility, which are now cancelled.

**MINOR SOURCE PERMIT TO OPERATE / CONSTRUCT
AIR POLLUTION CONTROL FACILITY
STANDARD CONDITIONS**

(February 13, 2020)

A. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ) in accordance with and under the authority of the Oklahoma Clean Air Act. The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. This specifically includes compliance with the rules of the other Divisions of DEQ: Land Protection Division and Water Quality Division.

B. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-7-15(g)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-7-15(f)]

C. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-7-18(a)]

D. Unless specified otherwise, the term of an operating permit shall be unlimited.

E. Notification to the Air Quality Division of DEQ of the sale or transfer of ownership of this facility is required and shall be made in writing by the transferor within 30 days after such date. A new permit is not required. [OAC 252:100-7-2(f)]

F. The following limitations apply to the facility unless covered in the Specific Conditions:

1. No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility. [OAC 252:100-3]
2. All facilities that emit air contaminants are required to file an emission inventory and pay annual operating fees based on the inventory. Instructions are available on the Air Quality section of the DEQ web page. <https://oklahoma.gov/deq.html> [OAC 252:100-5]
3. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-9]
4. Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning subchapter. [OAC 252:100-13]
5. No particulate emissions from new fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lbs/MMBTU. [OAC 252:100-19]
6. No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. [OAC 252:100-25]

7. No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
8. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lbs/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
9. Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with an organic material vapor-recovery system. [OAC 252:100-37-15(b)]
10. All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

G. Any owner or operator subject to provisions of NSPS shall provide written notification as follows: [40 CFR 60.7 (a)]

1. A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
2. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
3. A notification of the actual date of initial start-up of an affected facility postmarked within 15 days after such date.
4. If a continuous emission monitoring system is included in the construction, a notification of the date upon which the test demonstrating the system performance will commence, along with a pretest plan, postmarked no less than 30 days prior to such a date.

H. Any owner or operator subject to provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment. [40 CFR 60.7 (b)]

I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by this subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least five years following the date of such measurements, maintenance, and records. [40 CFR 60.7 (f)]

J. Any owner or operator subject to the provisions of NSPS shall conduct performance test(s) and furnish to AQD a written report of the results of such test(s). Test(s) shall be conducted within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial start-up. [40 CFR 60.8]



PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

FESOP No. 2018-0199-O (M-2)

SteelFab Texas, Inc.,

having complied with the requirements of the law, is hereby granted permission to operate the SteelFab Texas, located in Section 9, Township 7S, Range 9E, Bryan County, Oklahoma, subject to standard conditions dated February 13, 2020, and specific conditions, both attached.

DRAFT

Lee Warden, P.E.
Chief Engineer

Date Issued

Bunky Dotson
BDotson@Steelfab-in.com
SteelFab Texas, Inc.
446 Country Club Road
Durant, OK 74701

Subject: Operating Permit No. **2018-0199-O (M-2)**
SteelFab Texas (Fac. ID: 18809)
Section 9, Township 7S, Range 9E; Bryan County, OK

Dear Mr. Dotson:

Enclosed is the permit authorizing operation at the referenced facility. Please note that this permit is issued subject to standard and specific conditions which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emission inventory for this facility. An emission inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emission Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at (918) 293-1615, or by e-mail at jennie.doan@deq.ok.gov. Air Quality personnel are located in the Regional Office at Tulsa, 9933 E. 16th Street, Tulsa, OK, 74128.

Sincerely,

DRAFT

Lee Warden, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosure

Choctaw Nation of Oklahoma
Attn: Gary Batton, Chief
P.O. Box 1210
Durant, OK 74702-1210

Subject: Operating Permit No. **2018-0199-O (M-2)**
SteelFab Texas, Inc., SteelFab Texas (Fac. ID: 18809)
Section 9, Township 7S, Range 9E, (33.96843°, -96.36557°), Bryan County
Date Received: October 27, 2025

Dear Chief Batton:

Pursuant to our Enhanced Tribal Engagement Policy, please accept this notification that the Oklahoma Department of Environmental Quality (DEQ), Air Quality Division (AQD), has received the above-referenced Tier I permit application and developed a draft permit. The public participation process requires a 30-day public comment period on the draft permit. Since the proposed project falls within the Choctaw Nation's reservation boundaries, DEQ is providing this direct notice to the Choctaw Nation.

DEQ recognizes that the Choctaw Nation has important interests that could potentially be affected by the above-referenced project and welcomes the Choctaw Nation's engagement and input during the permit review process. DEQ's website provides information on the review process and access to the draft permit, filed application, and related documents:

<https://applications.deq.ok.gov/PermitsPublicReview/>

If your staff would like additional information or would like to schedule an in-person meeting or conference call with DEQ to discuss the draft permit, please feel free to have them contact our Chief Engineer by email at lee.warden@deq.ok.gov, or by mail at:

Department of Environmental Quality, Air Quality Division
Attn: Lee Warden, Chief Engineer
P.O. Box 1677
Oklahoma City, OK, 73101-1677

If your staff has any questions, please have them reach out to Lee Warden at (405) 702-4237.
Sincerely,



Kendal Stegmann, Director
AIR QUALITY DIVISION

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-8-2025

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
AVO	Audio, Visual, or Olfactory	GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BBL	Barrel(s)	HAP	Hazardous Air Pollutants
BHP	Brake Horsepower (bhp)	HC	Hydrocarbon
BTEX	Benzene, Toluene, Ethylbenzene, Xylene	HCFC	Hydrochlorofluorocarbon
BTU	British thermal unit (Btu)	HFR	Horizontal Fixed Roof
C&E	Compliance and Enforcement	HON	Hazardous Organic NESHAP
CAA	Clean Air Act	HP	Horsepower (hp)
CAM	Compliance Assurance Monitoring	HR	Hour (hr)
CAS	Chemical Abstract Service	I&M	Inspection and Maintenance
CAAA	Clean Air Act Amendments	IBR	Incorporation by Reference
CC	Catalytic Converter	ICE	Internal Combustion Engine
CCR	Continuous Catalyst Regeneration	LAER	Lowest Achievable Emission Rate
CD	Consent Decree	LB	Pound(s) [Mass] (lb, lbs, lbm)
CEM	Continuous Emission Monitor	LB/HR	Pound(s) per Hour (lb/hr)
CFC	Chlorofluorocarbon	LDAR	Leak Detection and Repair
CFR	Code of Federal Regulations	LNG	Liquefied Natural Gas
CI	Compression Ignition	LT	Long Ton(s) (metric)
CNG	Compressed Natural Gas	LTPD	Long Tons per Day
CO	Carbon Monoxide or Consent Order	LPE	Legally and Practicably Enforceable
COA	Capable of Accommodating	M	Thousand (Roman Numeral)
COM	Continuous Opacity Monitor	MAAC	Maximum Acceptable Ambient Concentration
D	Day	MACT	Maximum Achievable Control Technology
DEF	Diesel Exhaust Fluid	MM	Prefix used for Million (Thousand-Thousand)
DG	Demand Growth	MMBTU	Million British Thermal Units (MMBtu)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
EGU	Electric Generating Unit	MMSCF	Million Standard Cubic Feet (MMscf)
EI	Emissions Inventory	MMSCFD	Million Standard Cubic Feet per Day
EPA	Environmental Protection Agency	MSDS	Material Safety Data Sheet
ESP	Electrostatic Precipitator	MWC	Municipal Waste Combustor
EUG	Emissions Unit Group	MWe	Megawatt Electrical
EUSGU	Electric Utility Steam Generating Unit	NA	Nonattainment
FCE	Full Compliance Evaluation	NAAQS	National Ambient Air Quality Standards
FCCU	Fluid Catalytic Cracking Unit	NAICS	North American Industry Classification System
FEL	Federally Enforceable Limit(s)		
FESOP	Federally Enforceable State Operating Permit		
FIP	Federal Implementation Plan		
FR	Federal Register		

NESHAP	National Emission Standards for Hazardous Air Pollutants	SCC	Source Classification Code
NH₃	Ammonia	SCF	Standard Cubic Foot
NMHC	Non-methane Hydrocarbon	SCFD	Standard Cubic Feet per Day
NGL	Natural Gas Liquids	SCFM	Standard Cubic Feet per Minute
NO₂	Nitrogen Dioxide	SCR	Selective Catalytic Reduction
NO_x	Nitrogen Oxides	SEP	Supplemental Environmental Project
NOI	Notice of Intent	SER	Significant Emission Rate
NSCR	Non-Selective Catalytic Reduction	SI	Spark Ignition
NSPS	New Source Performance Standards	SIC	Standard Industrial Classification
NSR	New Source Review	SIP	State Implementation Plan
		SNCR	Selective Non-Catalytic Reduction
O₃	Ozone	SO₂	Sulfur Dioxide
O&G	Oil and Gas	SO_x	Sulfur Oxides
O&M	Operation and Maintenance	SOP	Standard Operating Procedure
O&NG	Oil and Natural Gas	SRU	Sulfur Recovery Unit
OAC	Oklahoma Administrative Code	T	Tons
OC	Oxidation Catalyst	TAC	Toxic Air Contaminant
OGI	Optical Gas Imaging	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule	µg/m³	Micrograms per Cubic Meter
PCB	Polychlorinated Biphenyls	US EPA	U. S. Environmental Protection Agency
PCE	Partial Compliance Evaluation		
PEA	Portable Emissions Analyzer	VFR	Vertical Fixed Roof
PFAS	Per- and Polyfluoroalkyl Substance	VMT	Vehicle Miles Traveled
PM	Particulate Matter	VOC	Volatile Organic Compound
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VOL	Volatile Organic Liquid
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VRT	Vapor Recovery Tower
POM	Particulate Organic Matter or Polycyclic Organic Matter	VRU	Vapor Recovery Unit
ppb	Parts per Billion	YR	Year
ppm	Parts per Million	2SLB	2-Stroke Lean Burn
ppmv	Parts per Million Volume	4SLB	4-Stroke Lean Burn
ppmvd	Parts per Million Dry Volume	4SRB	4-Stroke Rich Burn
PSD	Prevention of Significant Deterioration		
psi	Pounds per Square Inch		
psia	Pounds per Square Inch Absolute		
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		

From: [Jennie Doan](#)
To: [DEQ AQD APU](#)
Subject: Please update Onbase: SteelFab Draft Permit for Public Review
Date: Wednesday, October 21, 2026 12:30:34 PM
Attachments: [2018-0199-O \(M-2\) DRAFT .pdf](#)

Hello APU,

Please update Onbase for draft permit for public review.

In addition, below is the Listerv languages for notice.

SteelFab Texas, Inc. (applicant) has applied for a modification of the individual minor source operating permit for their SteelFab Texas facility to operate the new Peddinghaus plasma-cutting unit (EU #ES-09) and its associated dust collector (CD-5) authorized in Construction Permit No. 2018-0199-C (M-2). The SteelFab Texas facility is a structural metal fabrication facility.

This permit will go through a 30-day period for public review and comment. If the online status is open, then the permit is still open for comment.

The permit is available at <https://applications.deq.ok.gov/PermitsPublicReview> ”

Permit No.: 2018-0199-O (M-2)
Company Name: SteelFab Texas, Inc.
Facility Name: SteelFab Texas
Facility ID: 18809

Thank you!

Jennie Doan

Oklahoma Department of Environmental Quality
Regional Office at Tulsa

From: Jennie Doan
Sent: Wednesday, October 21, 2026 12:25 PM
To: Joseph Kinyoun <joseph.kinyoun@meridianee.com>
Subject: SteelFab Draft Permit for Public Review

Hello Joseph,

Attached is the copy of the permit draft that will be made available on the DEQ website for a 30-day public review period. Please keep in mind that any comment that facility make during this public comment period will be treated as public comment.

Permit No.: 2018-0199-O (M-2)
Company Name: SteelFab Texas, Inc.
Facility Name: SteelFab Texas
Facility ID: 18809

Please contact me if you have any question.

Best,

Jennie Doan

Oklahoma Department of Environmental Quality
Regional Office at Tulsa