



## APCD Information Request – Welding Operations

The San Diego Air Pollution Control District (APCD) is gathering information from facilities that conduct welding operations in San Diego County.

The APCD is requesting submittal of the information specified below within 60 days from receipt of this notification. Please submit the requested information to [apcdcomp@sdcounty.ca.gov](mailto:apcdcomp@sdcounty.ca.gov) or to 10124 Old Grove Rd., San Diego, CA 92131, Attn: Compliance Division. Failure to provide the requested information may result in compliance actions. For assistance on how to respond to this information request, please contact the APCD's Business Assistance Coordinator, Suha Haddad, at [apcdcomp@sdcounty.ca.gov](mailto:apcdcomp@sdcounty.ca.gov) or at (858) 586-2650. Assistance in Spanish is also available.

The requested information will be used to help identify facilities that may require an air pollution control permit based on health risk thresholds established in APCD Rule 1200 – Toxic Air Contaminants-New Source Review. If, upon review of the requested information, the APCD makes a determination that an applicable health risk threshold may be exceeded, you will be notified in writing if an APCD permit is required. The information substantiating the permit determination will be available for review upon request and the APCD will be available to answer any questions regarding the determination. Please see attached advisory for more details.

- .....
1. Please provide the following information about your operation:

Facility Name:	
Facility Address:	
Description of Facility Activities:	

2. Does this facility perform welding at this location?  
☐ Yes      ☐ No, skip to Question #9
3. Did any of the welding activities begin at this location after November 15, 2000?  
☐ Yes      ☐ No
4. Were the welding operations at this location modified after November 15, 2000 in such a manner that increased air emissions?<sup>1</sup>  
☐ Yes, please describe the nature of the modification below (or attach more details) ☐ No, skip to Question #9

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<sup>1</sup> Examples of modifications that may increase air emissions include expansion of welding capacity, addition of new welding operations, or any other physical or production change that increased welding emissions above the facility's baseline as it existed prior to November 15, 2000.

5. Does this facility use stainless steel or copper/nickel or other high alloy welding materials containing > 11% chrome or > 5% nickel at this location?

☐ Yes, please specify \_\_\_\_\_ ☐ No ☐ Unknown

6. What is the minimum distance between any welding activity conducted at this facility and the nearest residence: \_\_\_\_\_ feet

7. What is the minimum distance between any welding activity conducted at this facility and the nearest (unrelated) business: \_\_\_\_\_ feet

8. Please provide the following information for each individual welding material (consumable rod/wire/filler) used.

- Welding Material Name
- Welding Material Manufacturer
- Welding Material Maximum Annual Usage (pounds/year)<sup>2</sup>
- Number of hours welding activities are conducted daily (on average)<sup>3</sup>
- Welding Type: GMAW, SMAW, MIG, TIG, FCAW, SAW, other for each type of welding material<sup>4</sup>
- Safety Data Sheet (SDS's) for each welding material<sup>5</sup>

Welding Material Name	Welding Material Manufacturer	Welding Material Maximum Annual Usage (pounds/year)	Number of hours welding activities are conducted daily (on average)	Welding Type: (GMAW, SMAW, MIG, TIG, FCAW, SAW)

<sup>2</sup> Maximum annual welding material usage is the maximum annual amount of each welding rod, wire, or filler used. Please report this weight in pounds per year. Welding material purchase records may be used to estimate this usage if no other records are available.

<sup>3</sup> Average number of hours welding operations are conducted per day.

<sup>4</sup> Welding Type includes: GMAW (gas metal arc welding), SMAW (shielded metal arc welding), MIG (metal inert gas welding), TIG (tungsten inert gas welding), FCAW (flux core arc welding), SAW (submerged arc welding). A rod/wire may be used under multiple welding types. The APCD needs to know how many pounds of each rod/wire was welded for each welding type. A list of common rods/wires and welding types can be found at: [https://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering\\_Emissions\\_Inventory/Welding\\_Calc.html](https://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory/Welding_Calc.html).

<sup>5</sup> If SDS's are not available or cannot be provided, it is important to report the Rod/Wire Name and Rod/Wire Manufacturer so SDS's can be researched by the APCD. Manufacturer data can be provided, in lieu of the SDS, if it contains wire/rod name, manufacturer, and composition.

Welding Material Name	Welding Material Manufacturer	Welding Material Maximum Annual Usage (pounds/year)	Number of hours welding activities are conducted daily (on average)	Welding Type: (GMAW, SMAW, MIG, TIG, FCAW, SAW)

9. Please provide the name and contact information for the person responsible for the information provided:

Contact Person Name:		
Title:		Date:
E-Mail:		Phone Number:



## Welding Operations Advisory

The San Diego Air Pollution Control District (APCD) is issuing this advisory to notify facilities that may conduct welding operations of **existing** permitting requirements applicable to welding operations in San Diego County.

In accordance with APCD [Rule 11](#) – Exemptions from Rule 10 Permit Requirements, welding operations that, if uncontrolled, exceed any of the health risks specified in [Rule 1200](#) – Toxic Air Contaminants-New Source Review, Subsections (d)(1)(i), (d)(2), or (d)(3) are subject to permitting requirements, unless the welding operation was existing prior to November 15, 2000, **and** such operation was not subsequently modified in such a manner that increased emissions of toxic air contaminants. The APCD currently has data that indicates welding operations can create elevated health risks (i.e. health risks that exceed the standards in Rule 1200).

APCD [Rule 11](#) (d)(7)(iv) provides for an exemption from permitting requirements for “*brazing and welding equipment, including arc welding equipment and laser welding*”; however, this exemption does not apply for certain uncontrolled welding operations in accordance with APCD [Rule 11](#) (a)(5), which states:

*“...Section (d) of this rule shall not apply to any equipment, operation, or process that (i) emits or may emit toxic air contaminants, as defined in Rule 1200, and (ii) has emissions of toxic air contaminants that, in the absence of any emission control device or limitation on material usage or production, may be expected to exceed any standard specified in Rule 1200 (d)(1)(i), (d)(2), or (d)(3) as determined by the Air Pollution Control Officer. This provision shall not apply to any equipment, operation, or process for which construction or modification, as applicable, commenced prior to November 15, 2000, unless such equipment, operation, or process is subsequently modified in such a manner that increases emissions of one or more toxic air contaminants.*”

*In the event the Air Pollution Control Officer makes a preliminary determination that any standard specified in Rule 1200 (d)(1)(i), (d)(2), or (d)(3) may be exceeded, the Air Pollution Control Officer shall notify the owner or operator in writing and specify the information needed to make a final determination. If the Air Pollution Control Officer makes a final determination that emissions, in the absence of any emission control device or limitation on material usage or production, may be expected to exceed any standard specified in Rule 1200 (d)(1)(i), (d)(2), or (d)(3), the Air Pollution Control Officer shall notify the owner or operator in writing and include a statement that, as a result, Rule 11(d) does not apply and an Authority to Construct and Permit to Operate are therefore required.”*

In accordance with Rule 11(a)(5), the APCD is requesting submittal of the attached information within 60 days from receipt of this notification. This information is necessary to ensure welding operations are permitted in accordance with existing APCD rule requirements, which are based on cancer, acute or chronic health risks from these operations.

Once the requested information is evaluated by the APCD, per Rule 11(a)(5) if the APCD determines that “*in the absence of any emission control device or limitation on material usage or production, may be expected to exceed any standard specified in Rule 1200 (d)(1)(i), (d)(2), or (d)(3), **the Air Pollution Control Officer shall notify the owner or operator in writing and include a statement that, as a result, Rule 11(d) does not apply and an Authority to Construct and Permit to Operate are therefore required.***” Therefore, your facility will be notified by the APCD on whether a permit is required for the existing welding operation.

Since the existing welding permitting requirement is based on health risks, permitting welding operations aligns with the APCD’s mission to improve air quality to protect public health and the environment.