Permit Writer	Edward S. Andrews
Email Address	edward.s.andrews@wv.gov
Company Name	MAAX US Corp
Company ID	003-00026
Facility Name	Martinsburg
Permit Number	R13-2006E
County	Berkeley
Newspaper	*The Journal* 263-8931
Company Contact & Email	Boatright Isabel Isabel.Boatright@maax.com
Consultant Email Address	Rob Haberlein robhab@erols.com
Regional Office (if applicable)	EPRO

Publish Wed Dec 23 2015

30 days @ Fri Jan 22, 2016

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name MAAX US Corp - Martinsburg

Permitting Action Number R13-2006E Total Days 36 DAQ Days 8

Permitting Action:

- ○ Permit Determination
- ○ General Permit
- ○ Administrative Update
- ○ Temporary
- ○ Relocation
- ○ Construction
- ⊗ Modification
- ○ PSD (Rule 14)
- ○ NNSR (Rule 19)

Documents Attached:

- ⊗ Engineering Evaluation/Memo
- ⊗ Draft Permit
- ⊗ Notice
- ○ Denial
- ○ Final Permit/General Permit Registration
- ⊗ Completed Database Sheet
- ○ Withdrawal
- ○ Letter
- ○ Other *(specify)* _____

Date	From	To	Action Requested
12/10	EI	BCW	Please Review
12/18	BCW	EI	See Comments - Addition - Cvr to Notice

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	MAAX US Corporation			**Facility:**	Martinsburg
Region:	10	**Plant ID:**	003-00026	**Application #:**	13-2006E
Engineer:	Andrews, Edward S.			**Category:**	Rubber
Physical Address:	2011 MidAtlantic Ind Pky Martinsburg WV 25401			**SIC:** [3088] RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS - PLASTICS PLUMBING FIXTURES **NAICS:** [326191] Plastics Plumbing Fixture Manufacturing	
County:	Berkeley				
Other Parties:	ENV_CONT - Van der Wee, David 877-438-6229 VICE PRES - Van der Wee, David 877-438-6229				

Information Needed for Database and AIRS
1. Need valid physical West Virginia address with zip

Regulated Pollutants

	Methyl Methacrylate	2.710 TPY
STYR	Styrene	32.360 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	36.260 TPY
THAP	Total HAP Pollutants	35.070 TPY

Summary from this Permit 13-2006E

Air Programs		Applicable Regulations
		06 07 63 A
Fee Program	**Fee**	**Application Type**
	$3,500.00	MODIFICATION

Notes from Database
Permit Note: This action is for the installation of 2 UTILE lines and the removal of the Pearl Line.

Activity Dates

APPLICATION RECIEVED	11/04/2015
APPLICATION FEE PAID	11/05/2015
ASSIGNED DATE	11/05/2015

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 003-00026
Company: MAAX US Corporation
Printed: 12/10/2015
Engineer: Andrews, Edward S.

west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION/FACT SHEET

B ACKGROUND INFORMATION

Application No.:	R13-2006E
Plant ID No.:	003-00026
Applicant:	MAAX US Corp
Facility Name:	Martinsburg
Location:	Martinsburg
NAICS Code:	326191
Application Type:	Modification
Received Date:	November 4, 2015
Engineer Assigned:	Edward S. Andrews, P.E.
Fee Amount:	$3,500.00
Date Received:	November 5, 2015
Complete Date:	December 2, 2015
Due Date:	March 1, 2015
Applicant Ad Date:	November 4, 2015
Newspaper:	*The Journal*
UTM's:	Easting: 762.3 km Northing: 4,376.4 km Zone: 17
Description:	The application is for UTILE production operation and removal of the acrylic bathware (Pearl Line) operation at the Martinsburg Facility.

DESCRIPTION OF PROCESS

MAAX US Corp (MAAX) owns and operates the Martinsburg manufacturing facility. The facility produces tub and shower units for the construction industry. These products are made of fiberglass reinforced plastic composite. The facility is configured with two continuous gel coat production lines and one acrylic production line.

The two continuous productions are nearly identical. Molds are placed on an overhead rail system that moves to mold to each of application stations. Gel coat is applied to the mold. The gel coat adds the color of the final product. Then, a layer of polyester resin is applied. Fiberglass mat is rolled or reinforcement legs/support parts are pressed into the resin or another

layer of resin is applied with chopped fiberglass fibers. The actual process steps are dictated by the end use of the product (i.e. tub, shower stall, etc.). Then another layer of resin is added. Then the product is removed from the production line and sent to the grinder and trim area, where the edges are trimmed/grinded off and desired end holes are cut out for drains or fixtures.

The UTILE process consists of the following steps (please refer to Attachment F):
Application of Clear Gelcoat – uses a manually operated mechanical atomizing gelcoat applicator. The clear gelcoat contains 36.5% wt styrene and 6.7% wt MMA and a very small amount of UV initiator. The emissions from the clear gelcoat enclosure are exhausted to the Dürr preconcentrator system.

2. Clear Gelcoat Cure – the gelcoated panels are placed in a vertical rack and the fresh gelcoat layer is allowed to rest while curing to a gelled stage. The emissions from the curing racks are drawn into the clear gelcoat enclosure and then conveyed to the Dürr preconcentrator system.
3. Final Clear Gelcoat UV Cure – the tacky gelled clear gelcoat layer is instantly hardcured using high intensity UV light. The cure is instant - there are no significant emissions.

4. Ink Printing – a special UV-cured ink is applied to the clear gelcoat surface using two high-speed ink jet printers. The ink formulations have extremely low vapor pressure and are instantly cured by the UV light. There are no emissions from the ink.

5. Application of Pigmented Gelcoat – uses a manually operated mechanical gelcoat applicator. The pigmented gelcoat contains < 30% wt styrene and < 31% wt total VOC. The emissions from the pigmented gelcoat enclosure are exhausted to the Dürr preconcentrator system.

6. Pigmented Gelcoat Cure – the pigmented gelcoat cures as the panel molds travel through the cure tunnel to step 7. The panel molds are placed on small carts that are pulled through the tunnel by an automated mechanical chain drive conveying system. The curing emissions from the curing tunnel are exhausted to the Dürr preconcentrator system.

7. Application of Resin and Glass Fiber and Rollout – occurs in one of two lamination enclosures at the end of the cure tunnel. The resin and glass is applied to the cured gel coated mold surface with a manually operated non-atomizing mechanical resin/glass applicator. The resin contains <35% wt styrene and total VOC. After application, the workers use hand roller tools to flatten and rollout the wet fibers into a solid compact laminate layer on the mold. The resin emissions from the lamination enclosures are conveyed to the Dürr preconcentrator system.

8. Laminate Cure – the laminate cures as the panel molds travel back through the cure tunnel to step 9. As in step 6, the panel molds are placed on small carts that are pulled through the tunnel by an automated mechanical chain drive conveying system. The curing emissions from the curing tunnel are exhausted to the Dürr preconcentrator system.

9. Demolding – the rough laminate panel part is mechanically separated from the flat panel mold. The panel mold is cleaned, repaired if needed, and prepared for the next mold cycle (which

restarts at step 1). There is a very small amount of VOC emissions from the mold cleaning and prep process.

10. Finishing – the rough panel edges are cut and smoothed in a small trim booth that is shared by both lines. The finished panel is inspected and sent to packaging for shipment to the customer. The exhaust air from the trim booth is filtered with an industrial vacuum system and returned to the plant space. There are no significant PM emissions to the atmosphere.

The UTILE production line will be located in the existing storage area in the manufacturing building.

SITE INSPECTION

On November 11, 2014, Mr. Dan Bauerle, an inspector assigned to the Enforcement and Compliance Section of the DAQ, conducted a routine inspection of the facility. Mr. Bauerle found the facility to be operating in accordance with the facility's Title V Operating Permit, which incorporates all requirements from applicable rules, regulations, and permits into one enforceable document. Due to the nature of this change, the writer deemed that a site inspection of the facility for the proposed UTILE manufacturing operation is not necessary.

ESTIMATE OF EMISSION BY REVIEWING ENGINEER

The applicant provided emission estimates from the new UTILE process for styrene, methyl methacrylate (MMA), and volatile organic compounds. Styrene and MMA are classified as VOCs and hazardous air pollutants (HAPs). These estimates were based on the appropriate methods outlined in ANSI/ACMA Unified Emission Factors for these pollutants. MAAX plans on venting the UTILE manufacturing process to the existing preconcentrator system to control styrene and VOC emissions.

Table #1 – Potential Emission from the UTILE Line						
Pollutant	Styrene		MMA		VOCs	
Units	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Uncontrolled	43.46	190.35	3.64	15.96	48.70	231.30
Controlled	7.39	32.36	0.62	2.71	8.27	36.26

These calculations take into account the control efficiency of the Durr control device that is monitored monthly according to the existing permit.

Particulate matter emission generated due to the trimming and sanding of the finished UTILE sheets will be captured and collected in high efficiency dust collection system with the return exhaust being vented inside the manufacturing building. The edges of the UTILE sheets are going to be straight lines unlike the trimming and sanding of the bath unit, which are

irregular shapes. Thus, these operations for the UTILE will be minimal compared to the bath unit lines which have a potential of 0.06 tons per year after controls. The manufacturing building vents to the Dürr preconcentrator system. The Dürr preconcentrator system has pre-filter up stream of the actual preconcentrator wheel to prevent contamination of the carbon wheel of the preconcentrator from being fouled with particulate matter.

REGULATORY APPLICABLILITY

The proposed UTILE process made by MAAX does not affect the facility's applicability status with any rules or regulations. The facility will remain subject to 45 CSR 6, 45 CSR 7, 45 CSR 30, 45 CSR 34, and Subpart WWWW of 40 CFR 63.

The proposed UTILE process clearly increases potential VOC and HAP emission rates above the Rule 13 modification threshold values of 6 pounds per hour and 10 tons per year of VOCs (45 CSR §13-2.24.b.); and 2 pounds per hour or 5 tons per year of total HAPs (45 CSR §13-2.24.c.). Thus, MAAX is required to obtain a modification permit pursuant to 45 CSR 13.

The potential increase of VOC brings the facility wide potential of VOCs up to 266.13 tons per year. Thus, the facility's status as a minor source under the PSD program (45 CSR 14) will be changed to a major source once the modification is complete. Because this only has the potential to increase VOC emissions of 36 tons per year, no Prevention of Significant (PSD) review is required for this proposed modification. However, any further changes to the facility will have to undergo PSD review to determine if a major modification of a major source is triggered.

The trimming and sanding is subject to 45 CSR §7-5.1., which requires MAAX to control fugitive particulate. MAAX proposes to use a high efficiency dust collection system which vents the exhaust inside of the manufacturing building. The current manufacturing building meets the criteria of a permanent total enclosure. This space (exhaust contained in the manufacturing building) is controlled by the Durr preconcentrator system, which is subject to 45 CSR 6 as an incinerator. MAAX proposed that the modification will not increase of amount of particulate matter to be emitted from the control device (Durr preconcentrator system). Therefore, the permit will only have to include requirements to control the dust from the trimming and sanding operation as required by 45 CSR §7-5.1.

MAAX's operation is classified as an existing major source of HAPs under 40 CFR 63, Subpart WWWW – National Emission Standard for Hazardous Air Pollutants (4W NESHAP): Reinforced Plastic Composites Production. The proposed changes do not affect the facility's ability to comply with this regulation. The writer determined that the proposed operations would be operating at 83% of that HAP weighted average compliance option under Subpart WWWW without the use of the existing control device.

As a result of these changes, the source is required to submit a significant modification application for their Title V Operating Permit within 12 months after start-up of the process.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The proposed changes will not emit any pollutants that aren't already being emitted at the facility. Therefore, no information about the toxicity of the hazardous air pollutants (HAPs) is presented in this evaluation. Further, the facility is currently and will remain a major source for HAPs and these emissions are regulated under the 4W NESHAP.

AIR QUALITY IMPACT ANALYSIS

The writer deemed that an air dispersion modeling study or analysis was not necessary, because the proposed modification is not major under 45 CSR 14 by itself.

MONITORING OF OPERATIONS

The current monitoring and record keeping will remain in place. MAAX is required to use monitored and production data to determine actual emissions on a monthly basis, which they currently perform for Title V Reporting purposes (Emissions Inventory and Certified Emission Statements).

Because the applicant will be modifying the duct work for the collection system and adding the fifth preconcentrator wheel to the control device, the writer recommends requiring a test to demonstrate that the building meets the requirements of a permanent total enclosure and verification under EPA Test Method 204 six months after either installation of the fifth preconcentrator wheel or start-up of the 2nd UTILE Process Line. Requiring an actual test to demonstration compliance with the actual emission limit is not necessary because the existing permit requires monitoring of styrene concentration levels to determine the control efficiency of the preconcentrator on a monthly basis. Once the efficiency drops below 83%, the permit automatically requires a performance test to be conducted.

CHANGES TO PERMIT R13-2006C

The main focus of changes to the existing permit as a result of this modification is the increase in the VOC emission limits of the preconcentrator /RTO in Condition 4.1.2. and the requirement to control dust emissions from the sanding and trimming of the UTILE sheets.

The UTILE process would use clear production gel coat, which has a different HAP Emission Limit under Table 3 to Subpart WWWW of Part 63. This limit was added to Table 5.1.2. of the permit.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates the proposed modification of the facility will meet all the requirements of the applicable rules and regulations when operated in accordance to the permit application. Therefore, the writer recommends granting MAAX US Corp. a Rule 13 modification permit for the UTILE process located to be at their Martinsburg facility in Martinsburg, WV.

Edward S. Andrews, P.E.
Engineer

December 18, 2015
Date

West Virginia Department of Environmental Protection

Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Modify

R13-2006E

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
MAAX US Corporation
Martinsburg
003-00026

William F. Durham
Director

Issued: DRAFT •

This permit will supercede and replace Permit R13-2006D.

Facility Location:	718 Mid-Atlantic Parkway Martinsburg, Berkeley County West Virginia 25401
Mailing Address:	Same as above
Facility Description:	Reinforced Composite Manufacturing
NAICS Codes:	326191
UTM Coordinates:	762.3 km Easting • 4,376.5 km Northing • Zone 17
Permit Type:	Modification
Description of Change:	This action is for the installation of 2 UTILE Lines and removal of the Pearl Line.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

As a result of the granting of this permit, the source is subject to 45CSR30. The Title V (45CSR30) application will be due within twelve (12) months after the date of the commencement of the operation or activity (activities) authorized by this permit, unless granted a deferral or exemption by the Director from such filing deadline pursuant to a request from the permittee.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
EU1	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU2	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU3	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU4	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU5	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU6	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU7	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU8	ST1	Chop Gun (Magnum internal mix non-atomized spray gun TRT-1000-F)		171 lb/hr	RTO-C1
EU9	ST1	Gel Gun (Magnum external mix atomized spray gun ATG-3500 FIT-INT)		68.5 lb/hr	RTO-C1
EU10	ST1	Gel Gun (Magnum external mix atomized spray gun ATG-3500 FIT-INT)		68.5 lb/hr	RTO-C1
EU11	ST1	Gel Gun (Magnum external mix atomized spray gun ATG-3500 FIT-INT)		68.5 lb/hr	RTO-C1
EU12	ST1	Gel Gun (Magnum external mix atomized spray gun ATG-3500 FIT-INT)		68.5 lb/hr	RTO-C1
EU12A	ST1	Acrylic production chop gun (Magnum internal mix non-atomized spray gun TRT-1000		171 lb/hr	RTO-C1
EU14	ST4	Resin Storage Tank – HT-1		5,000 gal	None
EU15	ST5	Resin Storage Tank – HT-2		5,000 gal	None
EU16	ST6	Resin Storage Tank – HT-3		5,000 gal	None
EU16A	ST7	Resin Storage Tank – HT-4	2011	5,000 gal	None
EU13	ST2	Trim Saws/Grinding Area			DC-1 & DC-2
EU17	ST1	Natural gas fired RTO		8 MMBtu/hr	
EU18	ST1	Mold Release Wax Application			RTO-C1
UTILE Production Equipment					
UGC	ST-1	UTILE Gelcoat Clear Gun (common)	2016		RTO-C1
UGP-1	ST-1	UTILE Gelcoat Pigment Gun (Line 1)	2016		RTO-C1

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
UR1-1	ST-1	UTILE Resin Gun 1 (Line 1)	2016		RTO-C1
UR2-1	ST-1	UTILE Resin Gun 2 (Line 1)	2016		RTO-C1
UGP-2	ST-1	UTILE Gelcoat Pigment Gun (Line 2)	2017		RTO-C1
UR1-2	ST-1	UTILE Resin Gun 1 (Line 2)	2017		RTO-C1
UR2-2	ST-1	UTILE Resin Gun 2 (Line 2)	2017		RTO-C1
	ST-1	Sanding and Trimming of the UTILE Sheets	2016		Dust Collection system & RTO-C1

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NO_X**	Nitrogen Oxides
CBI	Confidential Business Information	**NSPS**	New Source Performance Standards
CEM	Continuous Emission Monitor	**PM**	Particulate Matter
CES	Certified Emission Statement	**$PM_{2.5}$**	Particulate Matter less than 2.5 μm in diameter
C.F.R. *or* CFR	Code of Federal Regulations	**PM_{10}**	Particulate Matter less than 10μm in diameter
CO	Carbon Monoxide	**Ppb**	Pounds per Batch
C.S.R. *or* CSR	Codes of State Rules	**Pph**	Pounds per Hour
DAQ	Division of Air Quality	**Ppm**	Parts per Million
DEP	Department of Environmental Protection	**Ppm_V or ppmv**	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	**PSD**	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	**Psi**	Pounds per Square Inch
HAP	Hazardous Air Pollutant	**SIC**	Standard Industrial Classification
HON	Hazardous Organic NESHAP	**SIP**	State Implementation Plan
HP	Horsepower	**SO_2**	Sulfur Dioxide
lbs/hr	Pounds per Hour	**TAP**	Toxic Air Pollutant
LDAR	Leak Detection and Repair	**TPY**	Tons per Year
M	Thousand	**TRS**	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	**TSP**	Total Suspended Particulate
MDHI	Maximum Design Heat Input	**USEPA**	United States Environmental Protection Agency
MM	Million	**UTM**	Universal Transverse Mercator
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**VEE**	Visual Emissions Evaluation
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour	**VOC**	Volatile Organic Compounds
NA	Not Applicable	**VOL**	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation*;

2.4. Term and Renewal

2.4.1. This permit supersedes and replaces previously issued Permit R13-2006D. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2006, R13-2006A, R13-2006B, R13-2006C, R13-2006D, R13-2006E, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 10.3.]

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1.]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] ***[State Enforceable Only]***

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary

exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded

in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The permittee is authorized to operate fiberglass reinforced plastic composite manufacturing using the open molding technique at the facility. Such operation shall be subject to the following emission and operating limitations:

a. Emissions released to the atmosphere from emission point ST1 shall not exceed the following rates on a pollutant basis, except for VOCs, while the concentrator/RTO is being restored as permitted under condition 4.2.1.

Table 4.1.1.a. - Emission Limits for Emission Point ST1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Annual Emissions (TPY)
PM_{10}	0.15	0.66
PM	0.15	0.66
Oxides of Nitrogen (NO_x)	2.47	10.82
Carbon Monoxide (CO)	10.01	43.84
VOC	36.60	128.34

An indicator that compliance with the PM_{10}/PM limit is being maintain by observing zero visible emission being observed and for the CO & NO_x limits is being maintain if the monthly consumption rate for the RTO is at or less than 5.7 MM cf per month.

b. During the restoration phase of the concentrator/RTO as permitted under condition 4.2.1, an alternative emission rate for VOCs from emission point ST1, shall not exceed the rates listed Table 4.1.1.b.

Table 4.1.1.b. - Alternative Emission Limits for Emission Point ST1 (Concentrator/RTO Stack)

Pollutant	Hourly Rate (lb/hr)	Total Allowed during the Restoration Phase (tons)
VOC	93.6	202.2

c. The permittee shall operate all spray guns at the lowest pressure that produces an acceptable spray pattern. The pump ratio for non-atomizing spray guns shall not exceed 11:1.

d. The permittee shall operate and maintain the spray equipment that is employing the non-atomizing spray technology in accordance with the spray equipment manufacturer's specification at all times. A copy of the manufacturer's specifications shall be maintained on site and made immediately available for inspection.

e. The permittee shall develop and implement a written training program and provide all production personnel formal training on the use of the non-atomizing resin application technology in accordance with the manufacturer's instructions and specifications on an annual

basis. Such training focus on training the application operator on the proper spray pattern at the lowest possible air pressure to achieve a non-atomizing spray. New production personnel shall be trained within the first 30 days of being employed by the permittee. The permittee shall maintain records of such training in accordance with 3.4.1. of this permit.

f. The permittee is only permitted to perform the application of gel coat or polyester resin in the spray booths that are ventilated to the concentrator/RTO control device. This requirement applies to manual or spray application techniques.

4.1.2. The permittee shall operate and maintain the concentrator/RTO in accordance with the following:

a. The supplemental fuel for the RTO shall be natural gas.

b. The combustion chamber temperature shall be set at 1575^0F at all times while RTO is functioning during any production day. Compliance with this limit shall be demonstrated with a chart recorder indicating continuous temperature measurement. Variations of temperature are allowed while chamber temperature adjusts to the set point during startup, process fluctuations, and shutdown.

c. The permittee is permitted to shut down the entire control device which includes the RTO when there is no production line in operation.

d. The control system includes the concentrator, RTO, and associated ductwork to include the ductwork used in the capture system.

e. The capture system shall be operated and maintained at a negative pressure in the ductwork going to the control device.

f. Visible Emissions from the RTO stack (Emission Point ST1) shall not exceed twenty (20) percent opacity.
[45CSR§6-4.3.]

4.1.3. The finishing operations (grinding and trim cutting) at the permitting identified as EU13 shall be operated and maintained in accordance with the following:

a. Emissions of particulate matter and particulate matter less than ten (10) micros emitted from emission point ST2 shall not exceed 0.01 pounds per hour and 0.06 tons per year.
[45CSR§7-10.5.]

b. Emissions of visible particulate matter emitted from emission point ST2 shall not exceed 20% opacity except for any period or periods aggregating no more than five minutes in any sixty minute period, which the visible emissions is less than 40% opacity during that period(s).
[45CSR§7-3.1.]

c. Emissions of visible particulate matter of 20% opacity or greater shall not be emitted from emission point ST1 except for any period or periods aggregating no more than eight (8) minutes per start-up for which the visible emissions is less than 40% opacity.
[45CSR§7-3.2.]

d. The permittee shall operate and maintain the particulate matter control devices identified as DC-1 and DC-2 with a pressure drop across each control device not to exceed 3 kPa. Compliance with this condition constitutes compliance with Condition 4.1.4.a.
[45CSR§7-5.1.]

4.1.4. The air drying of any container to remove VOCs is prohibited.

4.1.5. Emissions of VOCs from the four resin storage tanks shall not exceed 400 pounds per year. Such vessels shall be vented in a manner that is consistent with good engineering practices for polyester resin storage vessels and located inside of a structure with a roof.

4.1.6. The exhaust of trimming and sanding operations of UTILE process shall be venting a particulate matter control device(s) and vent back inside of the manufacturing building at all times when engaging of such activities.
[45 CSR §7-5.1.]

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

4.2.1. The permittee shall perform the following as a periodic monitoring plan for the Durr concentrator/RTO control system in which:

a. The permittee shall collect and replace a set of five (six*) styrene detector tubes every calendar month.

i. Four (Five) styrene concentration tubes will be in each of the outlets of the concentrator units;

ii. One styrene concentration tube will be in the process exhaust duct from the plant to the control system;

iii. The styrene detector tubes shall be capable of detecting a styrene concentration ranging from 2 ppm to at less 300 ppm with an accuracy of ± 15%. All tubes shall be analyzed within the same day to determine the styrene concentration in each tube. The average of the four concentration samples from the outlets will be compared to the process exhaust concentration sample using the following monthly screening equation:

$$AdsorptionEfficiency(\%) = 100\% - \frac{(Outlet1 + Outlet2 + Outlet3 + Outlet4(+Outlet5) * /4(5) *}{\text{Pr}ocessExhaust / 100}$$

* - These changes will go into effect once the once the fifth preconcentrator wheel is installed. The sum of the outlet concentration will be divided by number of outlets.

b. If the monthly detector tube readings return an average concentrator adsorption efficiency of 83% or less, than the permittee shall determine the adsorption efficiency of the concentrator by measuring the styrene concentration in the concentrator inlets and outlets in accordance with U.S. EPA Method 18 test. This testing shall determine the average adsorption efficiency during an entire eight-hour work shift. The permittee shall execute this testing within sixty (60) days after discovering that the efficiency is at or below 83%. This performance testing shall be conducted at a production rate under normal operating conditions. This testing shall be conducted in accordance with Condition 3.3.1. and using acceptable test methods.

c. If the results of the performance testing from item b. confirms that the average adsorption efficiency of the concentrator is at or below 83%, then the permittee shall complete restoration of the Durr concentrator/RTO control system, which is identified as RTO-C1, within 180 days after the permittee received the results of the testing required in Condition 4.2.1.b. At that time, the VOC limits of Table 4.1.1.b. are triggered. The limits of Table 4.1.1.b. shall remain in effect for a period not to exceed more than 180 days or once restoration is complete, whichever is first. Restoration of the control system shall consist of the following four actions:

- Adjust the Durr control system timing and operating parameters;
- Replace the air-seal gaskets in the four individual concentrator units if needed;
- Upgrade the thermal mass (ceramic block) in the regenerative thermal oxidizer (RTO) unit if needed; and
- Replace the carbon adsorption media blocks in the four individual concentrator units.

4.2.2. For the purpose of ensuring compliance with the limits in Condition 4.1.4. of this permit, the permittee shall monitor and record the pressure drop across each of the control devices identified as DC-1 and DC-2 on a semi-monthly basis. The filter for the dust collectors shall be inspected at least once per month and replace if necessary. Such records shall be maintained in accordance with Condition 3.4.1. of this permit.

4.2.3. For purposes of demonstrating compliance with 45CSR§§6-4.3., 6-4.4.; 45CSR§§7-3.1, 7-3.2.; Conditions 4.1.3., and 4.1.4., the permittee shall conduct visible emission checks of each emission point subject to an opacity limit once per month during periods of normal manufacturing operations using U.S. EPA Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point, compliance shall be determined by conducting addition observations in accordance with the visible emission test procedures in 45CSR§7A-2.1 for emission point ST2 and U.S. EPA Method 9 for emission point ST1 within 48 hours. If the addition observations determined that the opacity to be greater than the limit, than an evaluation to determine the cause of the exceedance shall be conducted within three (3) days, unless the cause of the exceedance is corrected within 24 hours. If after four consecutive months that no visible emissions were observed from the emission point, then the permittee may conduct such visible emission check once each calendar quarter. If any visible emissions are observed during the quarterly checks, visible emission check shall return to being performed each calendar month. Records shall be maintained in accordance with 3.4.1. of this permit and shall include all data required by U.S. EPA Methods 9 and 22, or the visible emission test procedure defined in 45CS§7A-2.1, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the result of the visible emission check or observation, observer's name, and if appropriate all corrective actions taken.

4.2.4. For the purpose of demonstrating compliance with the VOC limits in Condition 4.1.1., the permittee shall determine the VOC emission rate in terms of pounds per hour on a monthly average and a 12-month rolling total in terms of tons per year, which will be based on the material applied during each respective month, application method, and hours the facility operated during the month. The emission factors published in the most current version of the American National Standard Estimating Emission Factors from Open Molding and Other Composite Processes (ACMA UEF). The percentage of VOC monomer in the resin or gel coat shall be determined using the appropriate emission factor/procedure outline in the ACMA UEF standards. The permittee may use data obtained from material safety data sheets (MSDS), Certificate of Analysis, or resin specifications from the manufacturer of the product. This 12-month rolling total shall be conducted no later than 30 days from the end of the previous month. A 12 month rolling total

shall mean the sum of the individual material consumed at any given time for the previous twelve (12) consecutive months.

4.2.5. For purpose of demonstrating on-going compliance with Condition 4.1.3., the permittee shall measure the negative pressure environment through the exhaust duct pressure measured by the RTO control board on a daily basis. Records of such monitoring shall be maintained in accordance with 3.4.1. of this permit.

4.2.6. For purpose of demonstrating compliance with Conditions 4.1.3. and 4.1.7., the permit shall maintain a log of issues with the concentrator/RTO control device. Such log shall include a description of the issue, corrective action taken, date, length of time of the issue, and is or is not causing a deviation of emission limit or monitored parameter. Such log shall be maintained in accordance with Condition 3.4.1.

4.3. Testing Requirements

4.3.1. During the performance testing using U.S. EPA Method 18 or Method 25A testing on the control device identified as RTO-C1 or the only concentration part of the unit, the permittee shall conduct concurrent styrene detector tube testing as prescribed in condition 4.3.2. Results of such testing shall be included with the submitted results of the Method 18 or 25A testing to the Director.

4.3.2. After 180 days after start-up the second UTILE Process Line or completion of installation of the 5th concentrator wheel for the C1/RTO control device, the permittee shall conduct a test and evaluation of the manufacturing building to determine if the modification of the collection system for the C1/RTO control device meets the criteria of a permanent total enclosure in accordance with U.S. EPA Method 204.

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit, and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee shall maintain records of usage, MSDS, certificate of analysis, and other information used to determine actual VOC emission rate as required in Condition 4.1.1. Such records shall be maintained in accordance with Condition 3.4.1.

4.5. Reporting Requirements

4.5.1. If the results of the performance testing from 4.2.1.c. confirm that the average adsorption efficiency of the concentrator is at or below 83%, then the permittee shall notify the Director in writing within ten (10) days of permittee having received these results.

4.5.2. The permittee shall submit a detail report of the scope of work performed during the restoration of control device RTO-C1 within 30 days after completion of the restoration to the Director. Such report shall contain a either the total amount of VOC emissions during the restoration or the 12-month rolling VOC emission rates for each month during the restoration.

4.5.3. Coincide the reporting requirement of Condition 5.5.1., the permittee shall include the following information:

- The actual VOC emission rate for each calendar month and 12 month rolling total for each month of the reporting period from emission point ST1.

- The concentrator adsorption efficiency for each calendar month of the Durr concentrator/RTO system as required in Condition 4.2.1.a.

5.0. 40 CFR 63 - Subpart WWWW Requirements

5.1. Limitations and Standards

5.1.1. The permittee shall comply with all applicable requirements as set forth in 40 CFR 63 Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The following requirements are from this subpart and applicable to the permitted operation.

5.1.2. The permittee shall limit its operations at the facility in such a manner that the HAP emissions are equal to or less than the maximum limits for each operation as defined in Table 3 of Subpart WWWW and provided in the following table, Table 5.1.2.

Table 5.1.2. Organic HAP Limits

Operation Type	Use	Organic HAP Emissions Limit (lb/ton)[1]
Open molding non-corrosion resistant and/or high strength	Mechanical Resin Application	88
Open molding tooling	Manual Resin Application	157
Open molding gel coat	Tooling gel coat	440
Open molding gel coat	White/off white pigmented gel coat	267
Open molding gel coat	All other pigmented gel coat	377
Open molding gel coat	Clear Production Gel Coat	522

[40 CFR §63.5805(b) and Table 3 to Subpart WWWW of Part 63 – Organic HAP Emission Limits for Existing Open Molding Sources]

Compliance with the above list emission limits shall be demonstrated using one of the four methods. The permittee may switch between listed compliance options (See 40 CFR §§63.5810(a) – (d). However, the permittee must provide notice in accordance with Condition 5.2.2. and when changing to an option based on a 12-month rolling average, the permittee must based the average on the previous 12 months of data calculated using the compliance option that the permittee is changing to:

a. *Demonstrate that an individual resin or gel coat, as applied, meets the appliance emission limit.*

i. Calculated the actual organic HAP emissions factor for each different process stream with each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process steam Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in 40 CFR §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If the permittee elects to If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in 40 CFR

§63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to Subpart WWWW of Part 63, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\%\ \text{Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:

Percent Control Efficiency=a value calculated from organic HAP emissions test measurements made according to the requirements of 40 CFR §63.5850 to this subpart.

ii. If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

b. *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

i. Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i} \qquad \text{(Eq. 2)}$$

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i, lbs/ton;

$Material_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n=number of process streams where you calculated an organic HAP emissions factor.

ii. You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

iii. Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

c. *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

i. Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (EL_i * \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i} \qquad \text{(Eq. 3)}$$

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

Material_i =neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations.

ii. Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \quad \text{(Eq. 4)}$$

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

iii. Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

d. *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

i. For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

ii. You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

iii. You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

iv. You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

5.1.3. The permittee shall comply with the applicable work practice standards from Table 4 of Subpart WWWW as provided in Table 5.1.4. of this permit.

Table 5.1.3. Work Practice Standards

Operation	Work Practice Standard
For an existing cleaning operation.	The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying to the mold or reinforcement.
For a new or existing HAP-containing material storage operation.	The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented directly to the atmosphere as necessary for safety.
All mixing operations.[1]	The permittee shall install and use mixer covers with no visible gaps present in the mixer cover, except that gaps of up to 1 inch are permissible around the mixer shaft and any required instrumentation.
All mixing operations.[1]	The permittee shall close any mixer vents when actual mixing is occurring, except that vent is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95% efficient control device are exempt from this requirement.
All mixing operations.[1]	The permittee shall keep the mixer covers closed while actual mixing is occurring except that venting is allowed during adding of materials or as necessary prior to adding materials, or opening the cover for safety.

[40 CFR §63.5805(b) & Table 4 to Subpart WWWW of Part 63 – Work Practice Standards]

5.1.4. The affected sources as defined in 40 CFR §63.5790(b) located at this facility shall be operated and maintain according to the provisions in 40 CFR §63.6(e)(1)(i).

5.2. Monitoring Requirements

5.2.1. The permittee shall collect the appropriate records in accordance with 40 CFR §§63.5895 for the corresponding selected compliance option in §63.5810. This requirement may not supersede or replace the monitoring requirement in Section 4.2. of this permit.
[40 CFR §63.5895]

5.3. Testing Requirements

[Reserved]

5.4. Recordkeeping Requirements

5.4.1. The permittee shall maintain a copy of each notification and report that is required to be submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee has submitted according to the requirements in §63.19(b)(2)(xiv).

5.4.2. For the purposes of demonstrating compliance with HAP emission limits set forth in Condition 5.1.2. and 40 CFR 63, Subpart WWWW, the permit shall maintain records supporting one of the compliance options, as defined by Subpart WWWW.

5.5. Reporting Requirements

5.5.1. For the purpose of demonstrating compliance with the reporting requirements set forth in 40 CFR 63, Subpart WWWW, the permittee shall prepare and submit a semi-annual compliance report addressing any deviations from the applicable emissions limitations as defined in §63.5805(b) and the work practice standards as defined in §63.5805(b) during each reporting period. Such reports shall be submitted by September 15 and March 15 of each year to the Director. Such report shall contain the following:

a. Name of the Permittee;

b. Statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy , and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there were a startup, shutdown, or malfunction during the reporting period and the permittee took action consistent with the start-up, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i);

e. If there were no deviations from any organic HAP emission limitation (emission limit identify in Table 6.1.2.) and there are no deviations from the requirements for work practice standards in Table 6.1.4., a statement that there were no deviation from the organic HAP emission limitation or work practice standards during the reporting period.

f. For each deviation from an organic HAP emission limitation (Table 6.1.2.) and for each deviation from the requirements for work practice standards (Table 6.1.4.) that occurs during the reporting period, the compliance report must contain the following:

i. The total operating time of each affected source during the report period;

ii. Information on the number, duration, and cause of deviation (including unknown cause, if application), as applicable, and the corrective action taken.

[40 CFR §§63.5910(b)(5), (c), (d), and (e)]

APPENDIX A
EXAMPLE FORM

APPENDIX – [Monthly] Opacity Record

Date of Observation: _____

Data Entered by: _____

Reviewed by: _____

Date Reviewed: _____

Describe the General Weather Conditions:

Emission Point ID	Emission Point Description	Observation Time	Visible Emissions Yes/No	Consecutive Months of Visual Emissions	Comments

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] (please use blue ink) _____ Responsible Official or Authorized Representative _____ Date

Name & Title (please print or type) _____ Name _____ Title

Telephone No. _____ Fax No. _____

---

[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

   (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

   (ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.

Andrews, Edward S

From: Boatright Isabel <Isabel.Boatright@maax.com>
Sent: Thursday, December 10, 2015 3:36 PM
To: Andrews, Edward S
Subject: Re: MAAX Martinsburg - 003-00026_PERM_R13-2006E_preDRAFT.docx

Thank you very much!
Isabel

Sent from my iPhone

On Dec 10, 2015, at 09:48, Andrews, Edward S <Edward.S.Andrews@wv.gov> wrote:

> Isabel: I have deemed your application complete. Attached is a predraft that I have forward to my supervisor to review. Should you have any questions about the draft, please contact me.
>
> Thanks,
> Ed
>
> Edward S. Andrews, P.E.
> Engineer
> West Virginia Department of Environmental Protection
> Division of Air Quality
> 601 57th Street, SE
> Charleston, WV 25304
> 304.926.0499 ext. 1214

ID # 3-26
Reg R13-2006E
Company MAAX
Facility Martinsburg Initials EJA

<003-00026_PERM_R13-2006E_preDRAFT.docx>

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Andrews, Edward S

From: Boatright Isabel <Isabel.Boatright@maax.com>
Sent: Wednesday, December 02, 2015 10:21 AM
To: Andrews, Edward S
Subject: RE: MAAX Martinsburg R13-2006E

Hi Ed,
Please see below answers. Let me know if any other questions.
Thanks,

Isabel Boatright
Environment, Health and Safety Specialist
MAAX US Corp.
Tel. office 877-438-6229 x. 8463
Tel. cellular 229-740-0364
isabel.boatright@maax.com
www.maax.com

ID # 003-00026
Reg R13-2006E
Company MAAX
Facility Martinsburg Initials SK

From: Andrews, Edward S [mailto:Edward.S.Andrews@wv.gov]
Sent: Wednesday, December 02, 2015 8:05 AM
To: Boatright Isabel
Subject: MAAX Martinsburg R13-2006E

Isabel: I have a couple of questions with regards to your application for the UTILE Process.

1. Are the emissions estimates for both product lines combined?
Yes, the total emission estimates for new process are for both UTILE lines combined.

2. What projected hourly operation schedule was used to formulate annual material usage?
For existing operations, we assume a maximum 24/7 operation (8,760 hrs/yr) although the facility will always operate at less than continuous.
The UTILE lines are treated the same, the maximum annual material usage is projected for "continuous" operation even though the lines will never operate for 8,760 straight hours per year.

3. Could you provide more information about the dust collection system for the trim and sanding operations of the UTILE products.
The PM emissions from trim and sanding operations will be captured by a high efficiency dust collector system. The exhaust leaving the dust collector will be returned to the trim and sanding area.
Since there will be no outdoor emission point, there are no PM emissions by default. There may be a trace amount of PM in the plant air leaking out through the plant building enclosure. However, we currently have no fugitive emissions identified in the permit and no practical method to estimate fugitives (if they are even significant). Thus, we assume no PM emissions from the trim and grind process.
As far as details, we do not have final sketches yet but this is the concept the engineering firm is working on. We will combine room dust collection (i.e. torits systems) with source collection (at point of operation) and capture everything in the area.

Should you have any questions, please contact me.

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ID # 3-26
Reg R13-2006E
Company MAAX US Corp.
Facility Martinsburg

Certificate of Publication

This is to certify the annexed advertisement

Maax Corporation

appeared for 1 consecutive days/weeks in The Journal Publishing Company, a newspaper in the City of Martinsburg, WV in it's issue beginning:

11/04/2015

and ending

11/04/2015

The Journal
207 W. King Street
Martinsburg, WV 25401

Fee ($) 38.87

THE STATE OF WEST VIRGINIA
COUNTY OF BERKELEY

The foregoing instrument was acknowledged before me this 9th day of Nov. 2015 by

My commission expires Feb 7, 2021

Notary Public

OFFICIAL SEAL
STATE OF WEST VIRGINIA
NOTARY PUBLIC
Jeri L. Wines
203 Grove Springs Lane
Harpers Ferry, WV 25425
My Commission Expires Feb. 7, 2021

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that MAAX US Corp. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Modification Permit for a fiberglass bathroom manufacturing facility located on 718 Mid Atlantic Parkway, in Martinsburg, in Berkeley County, West Virginia. The latitude and longitude coordinates are: 39.496714 and -77.949531.

The applicant estimates the increased potential to discharge the following Regulated Air Pollutants will be: styrene 32.36 tpy, Methyl methacrylate 2.71 tpy, total VOC 36.26 tpy.

Startup of operation is planned to begin on or about the 6 day of June, 2016. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours. Dated this the 4th day of November, 2015.

By: MAAX US Corp.
David Van der Wee
Vice President of Operations
718 Mid Atlantic Parkway, Martinsburg, WV 25404

11:4 (1t)

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RECEIVED
NOV 25 2015
WV DEP / DIV OF AIR QUALITY

Andrews, Edward S

From: Ward, Beth A
Sent: Friday, November 06, 2015 10:36 AM
To: Andrews, Edward S
Subject: MAAX US CORP PERMIT APPLICATION FEE

This is the receipt for payment received from:

MAAX US CORP, MARTINSBURG, CHECK NUMBER 578741, CHECK DATE 10/14/2015, $3500.00
R13-2006E ID# 003-00026

OASIS Deposit CR 1600051667

Thank You!

Beth Ward

WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
BTO FISCAL
601 57TH STREET SE
CHARLESTON, WV 25304
(304) 926-0499 EXT 1846
beth.a.ward@wv.gov

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Adkins, Sandra K

From:	Adkins, Sandra K
Sent:	Thursday, November 05, 2015 10:40 AM
To:	'david.vanderwee@maax.com'; 'isabel.boatright@maax.com'
Cc:	McKeone, Beverly D; Andrews, Edward S
Subject:	WV DAQ Permit Application Status for MAAX US Corporation; Martinsburg

RE: Application Status
MAAX US Corporation
Martinsburg
Plant ID No. 003-00026
Application No. R13-2006E

Mr. Van der Wee,

Your application for a modification permit for the Martinsburg location was received by this Division on November 4, 2015, and was assigned to Ed Andrews. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.
**Please use telephone extension 1250 in future legal ads.*

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Ed stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Ed Andrews, at 304-926-0499, extension 1214.

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