west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

November 29, 2016

CERTIFIED MAIL
91 7199 9991 7037 0977 7463

Mr. John Peaper, HSE Manager
Cummins Crosspoint, LLC
602 New Goff Mountain Road
Cross Lanes, WV 25313

RE: **Permit Issuance**
Cummins Crosspoint, LLC
Cross Lanes
Permit No. R13-3323
Plant ID No. 039-00671

Dear Mr. Peaper:

Your application for an after-the-fact permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-3323 is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations. Please note, the source is not subject to 45CSR30.

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.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1219.

Sincerely,

Joe Kessler, PE
Engineer

Enclosures

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Construct

R13-3323

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 facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Cummins Crosspoint, LLC
Cross Lanes
039-00671

William F. Durham
Director

Issued: November 29, 2016

This permit will supercede and replace Consent Order CO-R13-E-2016-13.

Facility Location:	602 New Goff Mountain Rd., Cross Lanes, Kanawha County, West Virginia
Mailing Address:	602 New Goff Mountain Rd., Cross Lanes, WV 25313
Facility Description:	Engine Repair and Rebuild Shop
SIC/NAICS Code:	5013/441310
UTM Coordinates:	431.207 km Easting • 4,250.102 km Northing • Zone 17
Latitude/Longitude:	38.39663/-81.78790
Permit Type:	After-the-Fact Construction
Description:	After-the-fact construction of an engine repair and rebuild shop Consent Order (CO-R13-E-2016-13).

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.

The source is not subject to 45CSR30.

Table of Contents

1.0. Emission Units 3

2.0. General Conditions 4
2.1. Definitions 4
2.2. Acronyms 4
2.3. Authority 5
2.4. Term and Renewal 5
2.5. Duty to Comply 5
2.6. Duty to Provide Information 5
2.7. Duty to Supplement and Correct Information 5
2.8. Administrative Permit Update 6
2.9. Permit Modification 6
2.10. Major Permit Modification 6
2.11. Inspection and Entry 6
2.12. Emergency 6
2.13. Need to Halt or Reduce Activity Not a Defense 7
2.14. Suspension of Activities 7
2.15. Property Rights 7
2.16. Severability 7
2.17. Transferability 7
2.18. Notification Requirements 8
2.19. Credible Evidence 8

3.0. Facility-Wide Requirements 9
3.1. Limitations and Standards 9
3.2. Monitoring Requirements 9
3.3. Testing Requirements 9
3.4. Recordkeeping Requirements 11
3.5. Reporting Requirements 11

4.0. Source-Specific Requirements 13
4.1. Limitations and Standards 13
4.2. Monitoring Requirements 17
4.3. Testing Requirements 19
4.4. Recordkeeping Requirements 19

CERTIFICATION OF DATA ACCURACY 21

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E, 2E	Engine Dynamometer	2009	2,500 hp	None
2S	3E	Chassis Dynamometer	2009	600 hp	None
3S	4E	Paint Booth	2009	1.5 gal/hr	1C
4S	5E(1)	Filter Cleaner	2009	n/a	2C
5S	5E(1)	**Parts Washing**	2009	n/a	None
		Repair Shop Crystal Cleans Parts Washer #1			
		Repair Shop Crystal Cleans Parts Washer #2			
		MRC Rotary Parts Washer #1			
		MRC Rotary Parts Washer #2			
		MRC Parts Washer #1			
		MRC Parts Washer #2			
		MRC Parts Washer #3			
		MRC Parts Washer #4			
6S	7E	Ford ESG-642 Emergency Generator Set (Cummins Model GGFE-5938919) *Manufactured Date: 11/26/07*	(May) 2011	67 hp	None
7S	Fugitive	Cooling Tower	2009	154 gpm	None

(1) These units vent inside the shop building and then are evacuated outside through general exhaust fans.

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

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law 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 shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any 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 R13-3223 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 13-10.3]

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;

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 emission, 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 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

3.2.1. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method.

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, SE
Charleston, WV 25304-2345

If to the USEPA:

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 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall

be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.

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. Only those emission units as identified in Table 1.0, with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility. In accordance with the information filed in Permit Applications R13-3323, the emission units identified under Table 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, and shall not exceed the listed maximum design capacities.

4.1.2. **Engine Dynamometers (1S)**
Use of the engine dynamometers (1S) shall be in accordance with the following:

a. Aggregate emissions from the engine dynamometers , as emitted from emission points 1E and 2E, shall not exceed the following limits:

Table 4.1.2(a): Dynamometers Emission Limits(1)(2)

Pollutant	lb/hr	tpy
NO_X	77.50	54.66
CO	16.70	11.77
$PM_{2.5}/PM_{10}/PM$	5.50	3.84
SO_2	5.13	3.59
VOC	6.29	4.46

(1) The engine dynamometer is a passive device, it is not directly an emissions-generating unit (the engine(s) coupled to it produce the emissions). However, as various engines are tested in the dynamometer while it remains in place, the dynamometer has been designated the emissions unit in this case.
(2) The emission limits under Table 4.1.2(a) are in effect for all type engines tested in 1S (emission points 1E and 2E) and represent aggregate and not per-engine limits if more than one engine is tested at a time.

b. Engines tested in the dynamometers shall not exceed an aggregate of 2,500 horsepower (hp) and shall only be fired by Number 2 Fuel Oil; and

c. The maximum aggregate amount of diesel combusted while testing takes place in the engine dynamometers shall not exceed 190,000 gallons/year.

4.1.3. **Chassis Dynamometer (2S)**
Use of the chassis dynamometer (2S) shall be in accordance with the following:

a. Emissions from the chassis dynamometer, as emitted from emission point 3E, shall not exceed the following limits:

Table 4.1.3(a): Chassis Dynamometer Emission Limits(1)

Pollutant	lb/hr	tpy
NO_X	18.60	40.73
CO	4.01	8.78
$PM_{2.5}/PM_{10}/PM$	1.32	2.89

Pollutant	lb/hr	tpy
SO_2	1.23	2.69
VOC	1.51	3.30

(1) The chassis dynamometer is a passive device, it is not directly an emissions-generating unit (the vehicles tested on it produce the emissions). However, as various vehicles are tested in the dynamometer while it remains in place, the dynamometer has been designated the emissions unit in this case.

b. Vehicles tested in the chassis dynamometer shall only utilize diesel-fired engines not to exceed 600 hp; and

c. The maximum hours of operation of the chassis dynamometer shall not exceed 4,380 hours/year.

4.1.4. **Paint Booth (3S)**

Application of surface coatings in the paint booth (3S) shall be in accordance with the following:

a. Aggregate emissions from surface coating operations in the paint booth, as emitted from emission point 4E and as fugitive emissions, shall not exceed the following limits:

Table 4.1.4(a): Emission Limits

Pollutant	pounds/hour[1]	tons/year
Volatile Organic Compounds (VOCs)	5.21	22.81
Particulate Matter	0.06	0.24
Hazardous Air Pollutants (HAPs)[2]	3.23	14.13
Xylene	*1.66*	*7.25*
Methyl Isobutyl Ketone	*1.27*	*5.58*
Ethyl Benzene	*0.30*	*1.30*

(1) All pound/hour limits are as averaged over one calendar month of operations.
(2) HAPs are those chemical compounds listed under Section 112(b) of the Clean Air Act Amendments of 1990 and any amendments or revisions thereto. This limit is for the emission of all aggregated HAPs.

b. Sprayguns shall be installed, maintained, and utilized so as to achieve an average transfer efficiency of 60% in the application of any coatings within the spray booths;

c. The paint booth shall be designed, operated, and maintained with adequate negative pressure so as to capture all of the overspray from the application of the surface coatings and direct the overspray to the fiberglass paint arrestors;

d. Fiberglass paint arrestors, identified as 1C, shall be installed, maintained, and operated so as to achieve a minimum efficiency of 99.0% in the control of particulate matter emissions from the paint booth. At such times that is necessary to maintain the minimum particulate matter collection efficiency, 1C shall be replaced with new filters; and

e. At a minimum of bi-annually (no more than six months between checks), visual inspections of the spray guns, paint booths, and mat filters shall be made so as to ensure the achievement of the minimum transfer/capture/control efficiencies required above. The visual inspection shall be conducted so as to find any defect or deterioration in quality of the spray guns, paint booths, and mat filters that would cause or contribute to a reduction of the transfer/capture/control efficiency to below the minimums required in this section. Upon detection of a defect or a deterioration in

quality of any of the equipment, repair or replacement of the affected equipment shall take place prior to any further surface coating operations that utilize said affected equipment. A record of each visual inspection required above shall be maintained on site for a period of no less than three (3) years. The record shall include, but not be limited to, the date, time, listing of equipment checked, the results, what action(s), if any, was/were taken, and the name of the observer.

4.1.5. **Filter Cleaner (4S)**

Use of the Filter Cleaner (4S) shall be in accordance with the following:

a. Emissions from the filter cleaner, as emitted from emission point 5E, shall not exceed the following limits:

Table 4.1.3(a): Filter Cleaner Emission Limits

Pollutant	lb/hr	tpy
$PM_{2.5}/PM_{10}/PM$	0.11	0.49

b. The Filter Cleaner shall include a fabric cartridge filter, identified as 2C, to control particulate matter emissions from the unit. The particulate matter outlet emissions from the Filter Cleaner shall not exceed 0.01 gr/dscf. As based on manufacture's recommendation or at such times that is necessary to maintain the minimum particulate matter collection efficiency, 1C shall be replaced with new filters.

4.1.6. **Parts Washing (5S)**

Parts Washing (5S) shall be in accordance with the following:

a. Aggregate emissions from parts washing, as emitted from emission point 6E, shall not exceed the following limits:

Table 4.1.6(a): Parts Washing Emission Limits

Pollutant	lb/hr	tpy
VOC	0.03	0.14

b. Lids on the Parts Washers shall remain closed as much as possible, not to exceed a minimum of 90% of the time, to mitigate the evaporative emissions of VOCs in the use of cleaning solvents. The collection and disposal of any dirty or used cleaning solvents shall be done in a manner to minimize any evaporative emissions of VOCs; and

c. Solvent use in the Parts Washers shall not exceed the VOC-contents of Crystal Clean Premium 142 Mineral Spirits (in Repair Shop Crystal Cleans Parts Washer #1 and #2) and the Chem Station 50366 (remaining parts washers). Other cleaners/solvents may be used that have equivalent or better characteristics with respect to generating VOC emissions.

4.1.7. **Emergency Generator (6S)**

The emergency generator, identified as 6S, shall meet the following requirements:

a. The unit shall be a 67 hp 4-Stroke Rich Burn (4SRB) Ford Model ESG-642 Emergency Generator Set (Cummins Model GGFE-5938919), shall only be fired by pipeline-quality natural gas or liquified petroleum gas (propane), and shall not operate in excess of 500 hours per year during periods not defined as emergencies;

b. The maximum emissions from the Emergency Generator (regardless of fuel combusted) shall not exceed the limits given in the following table:

Table 4.1.7(b): Emergency Generator Emission Limits

Pollutant	PPH	TPY
CO	1.88	0.47
NO_x	2.05	0.51
VOC	0.10	0.03

c. Based on the size of the emergency generator (67 hp) and the date of manufacture (11/26/07), the unit is not subject to 40 CFR 60, Subpart JJJJ; and

d. **40 CFR 63, Subpart ZZZZ**
An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.
[40 CFR §63.6590(c)]

4.1.8. **Cooling Tower**
The cooling tower, identified as 7S, shall not process more than 80,942,200 gallons/year of cooling water.

4.1.9. **45CSR7 - Manufacturing Processes**
Emission sources 3S, 4S, and 7S shall comply with all applicable limitations and standards under 45CSR7, including the requirements given below under (a) through (d).

a. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.
[45CSR§7-3.1]

b. The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§7-3.2]

c. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.
[45CSR§7-4.1]

d. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest

fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1]

4.1.10. **45CSR7 - Manufacturing Processes**
The permittee shall comply with all applicable limitations and standards under 45CSR7, including the requirement given below under (a).

a. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2]

4.1.11. **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 and according to manufacturer's recommendations, 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, Compliance Demonstration, Recording and Reporting Requirements

4.2.1. **Usage Monitoring (1S, 2S, 6S, 7S)**
For the purposes of demonstrating continuous compliance with the limitations set forth in 4.1.2(c) 4.1.3(c), 4.1.7(a), and 4.1.8, the permittee shall monitor and record the monthly and rolling twelve month usage of the following: (1) diesel combusted in the engine dynamometers, (2) the hours of operation of the chassis dynamometer, (3) the hours of non-emergency operation of the emergency generator, and (4) amount of cooling water processed in the cooling tower.

4.2.2. **Actual Emissions Monitoring (3S)**
For the purposes of determining on-going compliance with the emission limits set forth in 4.1.4(a), the permittee shall monitor and record on a monthly basis the hourly, monthly, and rolling twelve month total emissions of the pollutants specified under 4.1.4(a) according to the following:

a. The permittee shall maintain records of the following:

(1) The name and volume (in gallons) of each material, as applied or used in the paint booth, on a monthly basis; and

(2) The mass of VOC, aggregate and speciated HAPs, and solids per volume of each material, as applied or used in the paint booth, on a monthly basis.

b. The following formulas shall be used to determine the quantities specified in 4.2.2(a) above.

(1) The mass of VOCs, aggregate and speciated HAPs, and solids per volume (in pounds per gallon) of each material shall be determined by one of the following methods:

(i) Certified Product Data Sheets ("Certified Product Data Sheets" shall have the definition assigned to them under 40 CFR 63, Subpart JJ) or an equivalent provided by the material

supplier;

(ii) A test conducted, or have conducted, by the permittee to determine the applicable quantities using either Method 24 of 40 CFR 60 or a test method approved in advance by the Director;

(iii) MSDS's if the material is used in an aggregate amount less than 100 gallons on an annual basis and for which either of the above two options is not reasonable; or

(iv) Another method on a case-by-case basis as approved in advance by the Director.

(2) The mass of VOCs, aggregate and speciated HAPs, and solids of each material, as applied, on a monthly basis, shall be calculated using the following formula:

*Mass(pounds of VOCs, HAPs, or Solids/Month) = A*B*

Where: A = monthly material usages in gallons per month
B = VOCs, HAPs, or Solids content of the materials used in pounds per gallon as determined under 4.2.2(b)(1).

(3) The annual, monthly, and hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated in the following manner:

(i) The annual emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the sum of the monthly emission rates of VOCs and aggregate and speciated HAPs, respectively, from the previous twelve (12) months.

(ii) The monthly emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the mass of VOCs and aggregate and speciated HAPs (as calculated above in 4.2.2(b)(2)), as applied, for the specified month.

(iii) The hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated, on a monthly basis, using the following formula:

Emission rate(pounds of VOCs, HAPs/Hour) = C/D

Where: C = Mass (pounds of VOCs, aggregate and speciated HAPs/Month)
D = Monthly hours of surface coating operations

(4) The annual, monthly, and hourly emission rates of PM shall be calculated in the following manner:

(i) The annual emission rate of PM shall be calculated as the sum of the monthly emission rate of PM from the previous twelve (12) months.

(ii) The monthly emission rate of PM shall be calculated using the following formula:

Emission rate(PM/month) = [C(1-(TE/100))]*[1-((CapEff/100)*(ConEff/100))]*

Where: C = Mass(pounds of Solids/Month)
TE = Estimated Minimum Transfer Efficiency of Surface Coating Operations (specified to be 60% under 4.1.4(b))

CapEff = Estimated Minimum Capture Efficiency of Spray Booths (specified to be 100% under 4.1.4(c))

ConEff = Estimated Minimum Control Efficiency of Mat Filters (specified to be 99.0% (as applicable) under 4.1.4(d))

(iii) The hourly emission rates of PM shall be calculated, on a monthly basis, using the following formula:

Emission rate(pounds of PM/Hour) = C/D

Where: C = Mass(pounds of Solids/Month)
D = Monthly hours of surface coating operations

c. The following materials may be excluded from actual emissions reporting under this section:

(1) those used during non surface-coating or production purposes (e.g., janitorial, maintenance) only; and

(2) touch-up markers, can-applied laquers, and contact glue, etc. provided that in no calendar year, as calculated under 4.2.2, VOC emissions do not exceed 1 ton per year.

4.3. Performance Testing Requirements

4.3.1. At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of 3.3 of this permit, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations or emission control requirements established in this permit and/or applicable regulations.

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. **45CSR21 Recordkeeping Requirements**

An owner or operator of a miscellaneous metal parts and products coating line that is exempt from the emission limitations in section 19.3 shall comply with the certification, recordkeeping, and reporting requirements in section 4.2.

[45CSR§21-19.7]

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 and 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 USEPA); or

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